

For Questions 1–4, please rate each of the items on a scale of 1–5.  
1= highest ranking [most important] 5=lowest ranking [least important]

**3** The study will evaluate and consider the potential impacts on many human environmental factors. Please rate the following in order of importance to you.

- ☒ 5 Neighborhoods, diverse communities, and residences
- ☒ 1 Economic development and growth
- ☒ 1 Land use
- ☒ 1 Public parks and recreation
- ☐
- ☐

**4** The study also will evaluate and consider the potential impacts on many natural environmental factors. Please rate the following in order of importance to you.

- ☒ 1 Air quality
- ☒ 1 Biological resources (for example: plants, wildlife, and habitats)
- ☒ 1 Geology/fissures, soils, and farmland
- ☒ 1 Hazardous materials
- ☒ 1 Historic structures and archaeological sites
- ☒ 5 Noise and vibration
- ☒ 1 Visual and aesthetics
- ☒ 1 Water resources (for example: rivers, washes, floodplains, and drainage)
- ☐
- ☐

**5** Identify the areas or resources within the Corridor Study Area that you feel must be avoided or are important to consider.

Saguaro National Park West  
The Rest is good for the I-11 Freeway

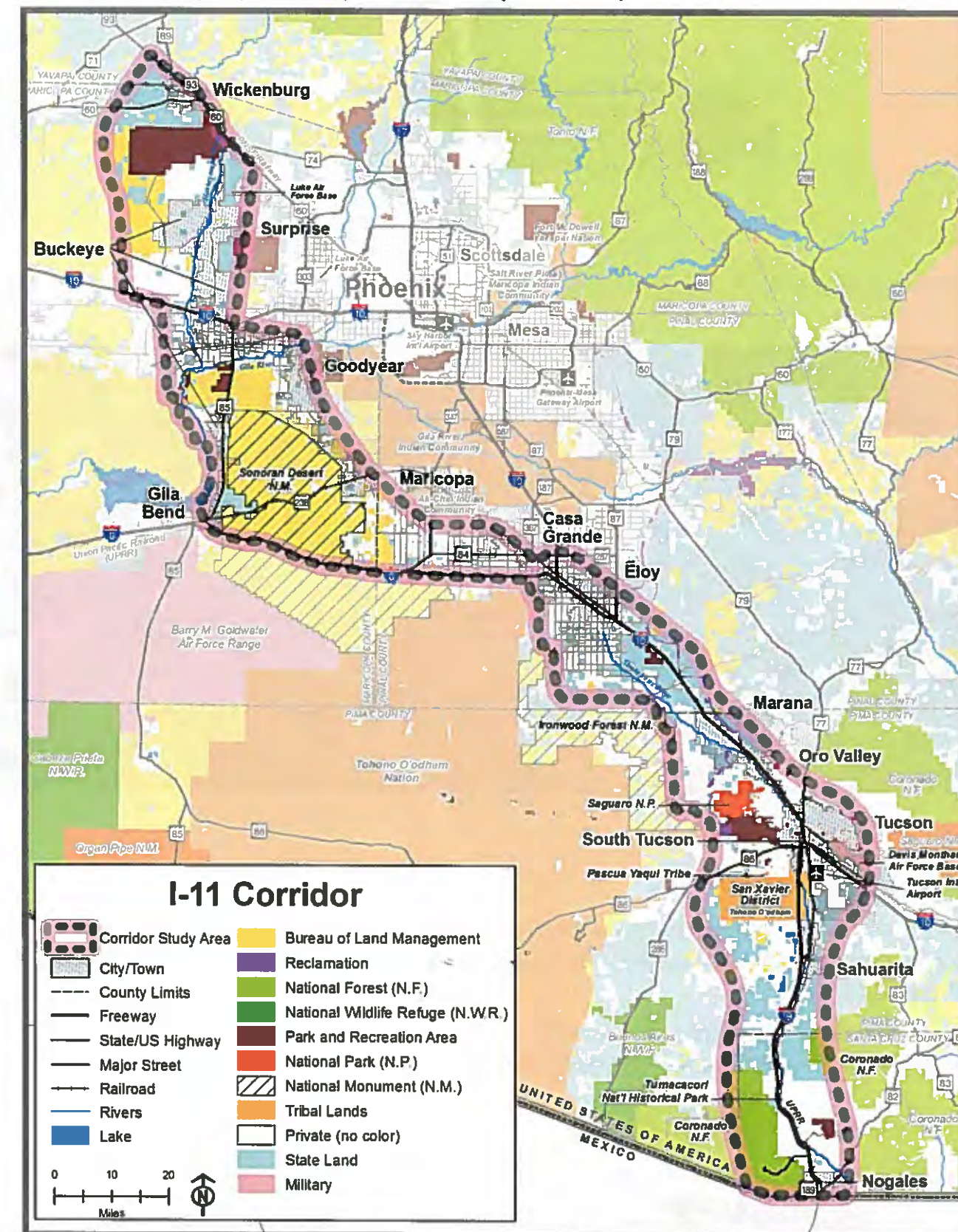
**6** How do you prefer to receive information:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Email     | <input type="checkbox"/> Facebook               |
| <input type="checkbox"/> Website              | <input type="checkbox"/> Text Messaging         |
| <input type="checkbox"/> Radio                | <input checked="" type="checkbox"/> Direct Mail |
| <input type="checkbox"/> Television           | <input type="checkbox"/> Blogs                  |
| <input checked="" type="checkbox"/> Newspaper | <input type="checkbox"/> Other _____            |
| <input type="checkbox"/> Twitter              |   |

**7** Additional comments:

Please build I-11 through Avra Valley! The metro needs a loop system on the west side. The metro is growing fast. Please build it sooner than later. Please Do Not double-deck or expand I-10 anymore.  
We need I-11 Now!!!

Please use this map to provide any comments on specific areas, ideas and concerns.



Thank you for your continued interest in the I-11 Study.





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

*Help Shape the Future of Arizona's Transportation System, TODAY!*

FOLD HERE

To be added to the study notification list, or to provide comments at any point during the process, please contact us:



i11study.com/Arizona



i-11ADOTStudy@hdrinc.com



1-844-544-8049 (Toll-free/bilingual)



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

FOLD HERE

## Next Steps

During the next several months, the Study team will analyze your comments and incorporate your ideas and preferences when identifying solutions (known as corridor alternatives) to address the needs of the I-11 Corridor.

Once the draft corridor alternatives have been identified, the public will be asked to provide feedback on the proposed solutions. This next round of public participation is anticipated in early 2017.



## ADOT Interstate 11 Corridor Tier 1 Environment Impact Statement NOGALES TO WICKENBURG

JUNE 2016

## PUBLIC SCOPING SURVEY

### Help Shape the Future of Arizona's Transportation System, TODAY!

Thank you for participating in the Interstate 11 (I-11) Tier 1 Environmental Impact Statement Public Scoping process by completing this survey. Public Scoping is a time for our team to learn from the community prior to embarking on the environmental study. We need your input on what transportation problems you experience today, how to solve these problems in the future, and what you feel is important within the I-11 Corridor Study Area.

**For Questions 1–4, please rate each of the items on a scale of 1–5.  
1= highest ranking [most important] 5=lowest ranking [least important]**

**1**

Please tell us what problems you experience today, or anticipate in the future, related to transportation in the Corridor Study Area that the I-11 project could address. *Please rate the following in order of importance to you.*

- ☐ Relieve local congestion, improve travel time and reliability (reduce how long a trip will take or ensure certainty of travel time)
- ☐ Relieve regional congestion, improve travel time and reliability (between Southern and Northwestern Arizona)
- ☐ Improve freight travel and reliability, reducing bottlenecks on existing highways
- ☐ Improve local access to communities and resources (parks, recreation, and tourism)
- ☐ Support a different transportation mode than what exists today
- ☐ Support homeland security and national defense needs
- ☐ Other desirable outcomes?

**2**

What should I-11 be or accommodate within the Corridor? *Please rate the following in order of importance to you.*

- ☐ New highway/freeway
- ☐ Combination of new and existing highway/freeway
- ☐ Enhance or expand existing highway/freeway
- ☐ Accommodate rail within corridor alternatives
- ☐ Accommodate utilities within corridor alternatives (for example: electric, fiber optic, communications)
- ☐ Accommodate rail and utilities within corridor alternatives





# ADOT Interstate 11 Corridor Tier 1 Environment Impact Statement (NOGALES TO WICKENBURG)

PUBLIC SCOPING SURVEY | JUNE 2016

For Questions 1–4, please rate each of the items on a scale of 1–5.  
1= highest ranking [most important] 5=lowest ranking [least important]

**3** The study will evaluate and consider the potential impacts on many human environmental factors. Please rate the following in order of importance to you.

- ☐ Neighborhoods, diverse communities, and residences
- ☐ Economic development and growth
- ☐ Land use
- ☐ Public parks and recreation
- ☒ NO BUILD

**4** The study also will evaluate and consider the potential impacts on many natural environmental factors. Please rate the following in order of importance to you.

- ☐ Air quality
- ☐ Biological resources (for example: plants, wildlife, and habitats)
- ☐ Geology/fissures, soils, and farmland
- ☐ Hazardous materials
- ☐ Historic structures and archaeological sites
- ☐ Noise and vibration
- ☐ Visual and aesthetics
- ☐ Water resources (for example: rivers, washes, floodplains, and drainage)
- ☒ NO BUILD

**5** Identify the areas or resources within the Corridor Study Area that you feel must be avoided or are important to consider.

X NO BUILD

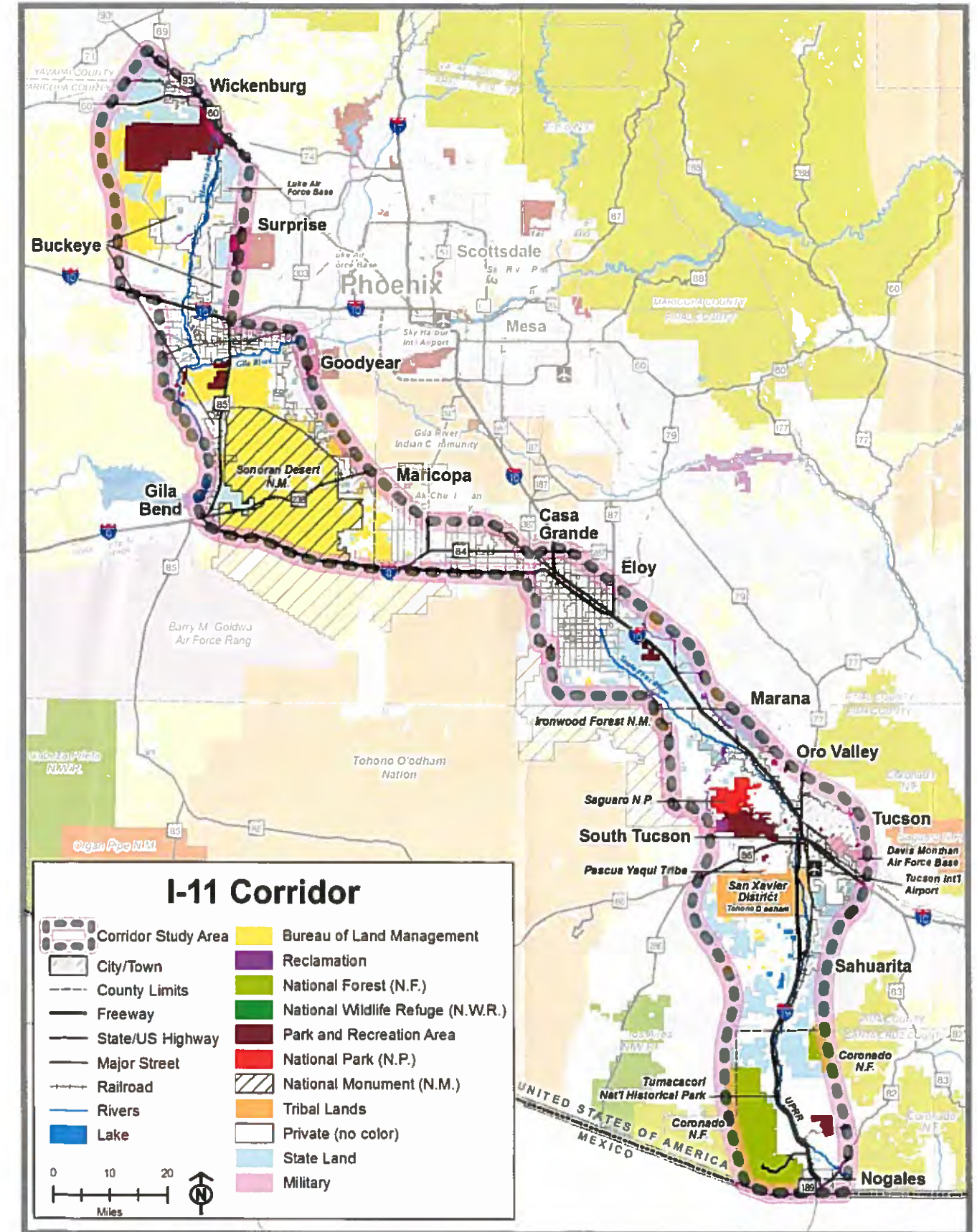
**6** How do you prefer to receive information:

- |                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/> Email      | <input type="checkbox"/> Facebook               |
| <input type="checkbox"/> Website    | <input type="checkbox"/> Text Messaging         |
| <input type="checkbox"/> Radio      | <input checked="" type="checkbox"/> Direct Mail |
| <input type="checkbox"/> Television | <input type="checkbox"/> Blogs                  |
| <input type="checkbox"/> Newspaper  | <input type="checkbox"/> Other _____            |
| <input type="checkbox"/> Twitter    |   |

**7** Additional comments:

MAKES NO SENSE  
NO BUILD  
THE CITY OF MARICOPA THINKS THEY HAVE SOMETHING TO OFFER TO JUSTIFY A MAJOR FREEWAY TO COME THROUGH THEIR TOWN THAT DOES NOT EVEN HAVE A HOSPITAL (NOTHING HERE)  
(MAYOR PRICE / ANTHONY SMITH OUR PUSHING FOR THIS. NOT THE PUBLIC.)

Please use this map to provide any comments on specific areas, ideas and concerns.



Thank you for your continued interest in the I-11 Study.





c/o ADOT Communications  
1655 W. Jackson Street, Mail Drop 126F  
Phoenix, AZ 85007

PHOENIX AZ 852

05 JUL 2016 PM 9 L



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

Help Shape the Future of Arizona's Transportation System, TODAY!

FOLD HERE

To be added to the study notification list, or to provide comments at any point during the process, please contact us:



[i11study.com/Arizona](http://i11study.com/Arizona)



[i-11ADOTStudy@hdrinc.com](mailto:i-11ADOTStudy@hdrinc.com)



1-844-544-8049 (Toll-free/bilingual)



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

FOLD HERE

## Next Steps

During the next several months, the Study team will analyze your comments and incorporate your ideas and preferences when identifying solutions (known as corridor alternatives) to address the needs of the I-11 Corridor.

Once the draft corridor alternatives have been identified, the public will be asked to provide feedback on the proposed solutions. This next round of public participation is anticipated in early 2017.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Zip Code: (required) \_\_\_\_\_

Email: \_\_\_\_\_



## ADOT Interstate 11 Corridor Tier 1 Environment Impact Statement NOGALES TO WICKENBURG

JUNE 2016

## PUBLIC SCOPING SURVEY

## Help Shape the Future of Arizona's Transportation System, TODAY!

Thank you for participating in the Interstate 11 (I-11) Tier 1 Environmental Impact Statement Public Scoping process by completing this survey. Public Scoping is a time for our team to learn from the community prior to embarking on the environmental study. We need your input on what transportation problems you experience today, how to solve these problems in the future, and what you feel is important within the I-11 Corridor Study Area.

**For Questions 1–4, please rate each of the items on a scale of 1–5.  
1= highest ranking [most important] 5=lowest ranking [least important]**

**1**

Please tell us what problems you experience today, or anticipate in the future, related to transportation in the Corridor Study Area that the I-11 project could address. *Please rate the following in order of importance to you.*

**3**

Relieve local congestion, improve travel time and reliability (reduce how long a trip will take or ensure certainty of travel time)

**2**

Relieve regional congestion, improve travel time and reliability (between Southern and Northwestern Arizona)

**1**

Improve freight travel and reliability, reducing bottlenecks on existing highways

**4**

Improve local access to communities and resources (parks, recreation, and tourism)

Support a different transportation mode than what exists today

**5**

Support homeland security and national defense needs

Other desirable outcomes?

**2**

What should I-11 be or accommodate within the Corridor? *Please rate the following in order of importance to you.*

New highway/freeway

**1**

Combination of new and existing highway/freeway

**2**

Enhance or expand existing highway/freeway

Accommodate rail within corridor alternatives

Accommodate utilities within corridor alternatives (for example: electric, fiber optic, communications)

**3**

Accommodate rail and utilities within corridor alternatives

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



**FOR MORE INFORMATION:**

1-844-544-8049

[i-11ADOTStudy@hdrinc.com](mailto:i-11ADOTStudy@hdrinc.com)  
[i11study.com/Arizona](http://i11study.com/Arizona)





# ADOT Interstate 11 Corridor Tier 1 Environment Impact Statement (NOGALES TO WICKENBURG)

PUBLIC SCOPING SURVEY | JUNE 2016

For Questions 1–4, please rate each of the items on a scale of 1–5.  
1= highest ranking [most important] 5=lowest ranking [least important]

**3** The study will evaluate and consider the potential impacts on many human environmental factors. *Please rate the following in order of importance to you.*

- ☒ 1 Neighborhoods, diverse communities, and residences
- ☒ 2 Economic development and growth
- ☐ Land use
- ☐ Public parks and recreation
- ☐
- ☐

**4** The study also will evaluate and consider the potential impacts on many natural environmental factors. *Please rate the following in order of importance to you.*

- ☒ 1 Air quality
- ☒ 2 Biological resources (for example: plants, wildlife, and habitats)
- ☐ Geology/fissures, soils, and farmland
- ☐ Hazardous materials
- ☒ 3 Historic structures and archaeological sites
- ☐ Noise and vibration
- ☐ Visual and aesthetics
- ☒ 2 Water resources (for example: rivers, washes, floodplains, and drainage)
- ☐
- ☐

**5** Identify the areas or resources within the Corridor Study Area that you feel must be avoided or are important to consider.

*Avoid populated areas as much as possible. Also riparian and other habitat areas. Incorporate existing roadways, e.g., I-10, I-8, SR 85. No sense in developing totally new when one already exists.*

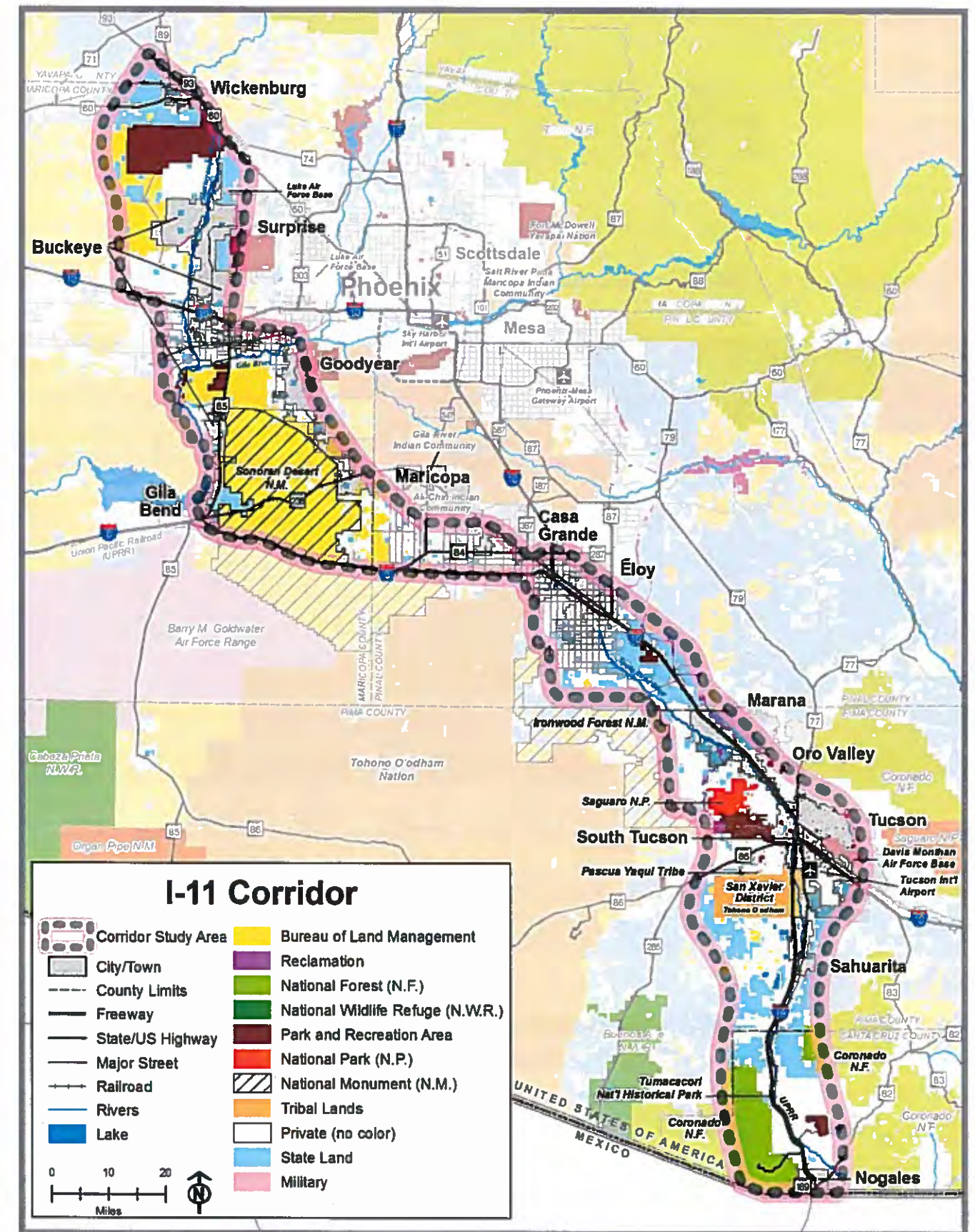
**6** How do you prefer to receive information:

- |  |   |
|--|---|
| <input type="checkbox"/> Email                 | <input type="checkbox"/> Facebook       |
| <input type="checkbox"/> Website               | <input type="checkbox"/> Text Messaging |
| <input checked="" type="checkbox"/> Radio      | <input type="checkbox"/> Direct Mail    |
| <input checked="" type="checkbox"/> Television | <input type="checkbox"/> Blogs          |
| <input checked="" type="checkbox"/> Newspaper  | <input type="checkbox"/> Other _____    |
| <input type="checkbox"/> Twitter               |   |

**7** Additional comments:

*It's difficult to rank some of these because I consider them of equal importance, e.g., my #2's under your 4 are overlapping. And the "noise" and "visual" link with the "neighborhoods" of your group 3. So I think I will not rank.*

Please use this map to provide any comments on specific areas, ideas and concerns.



Thank you for your continued interest in the I-11 Study.



## **Online Survey Responses (Summary)**

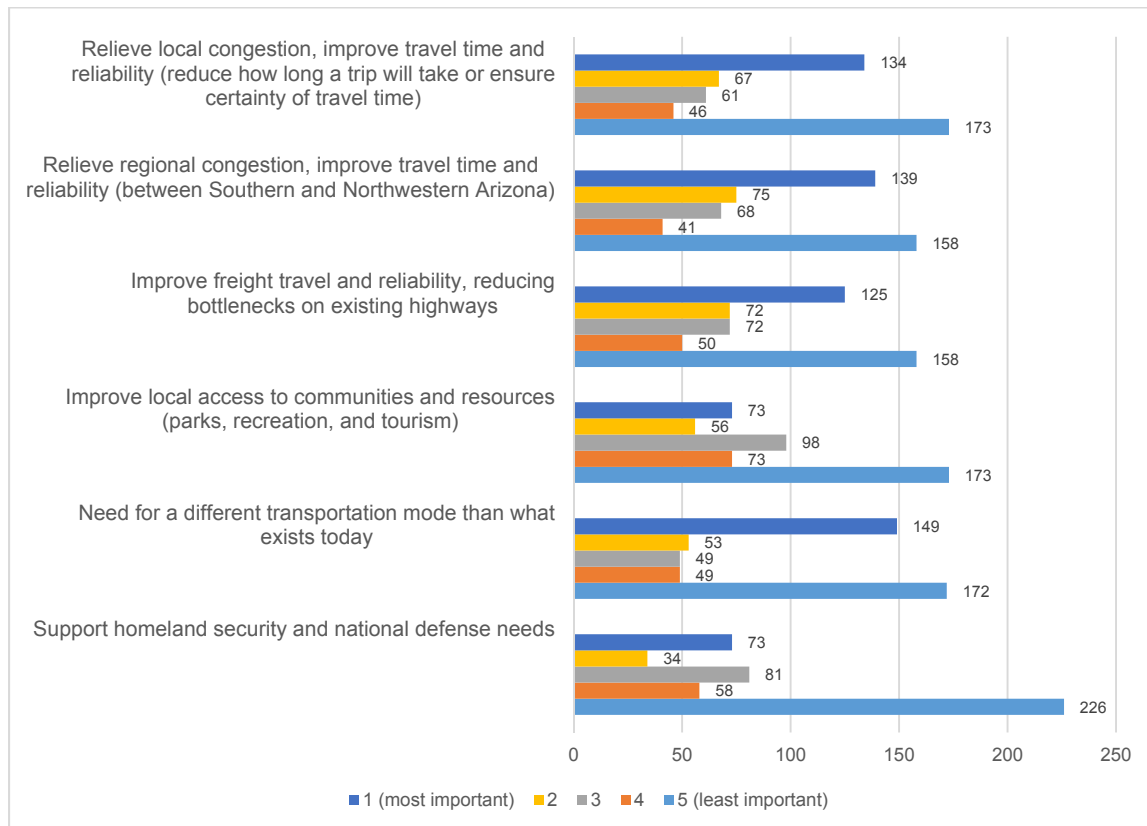


# I-11 Survey Monkey

## Summary of Responses: Summer 2016 Public Scoping

### Question 1

Please tell us what problems you experience today, or anticipate in the future, related to transportation in the Corridor Study Area that the I-11 project could address. Please rank the following in order of importance to you. (1= highest ranking [most important], 5=lowest ranking [least important]).



### Other desirable outcomes (open-ended response):

*[responses not edited for spelling, grammar, or capitalization]*

- Freeze construction of new homes until the current commuting demands are addressed and solved.
- Minimal disruption of the desert environment especially in the area of the Arizona Sonoran Desert Museum and the Saguaro National Park..
- Protecting what is left of the southern Arizona natural world. The area is already heavily fragmented by the CAP and freeways so I would propose an improved train system or double decking on I-10.
- Movement of Good
- Can't think of anything desirable about I-11...not needed
- protecting wildlife linkages, air quality and protected lands
- commuter rail in existing transportation corridor



- Establish passenger rail along I-10. Don't build I-11.
- Are the above things really what I-11 is all about, seriously???
- Potentially saving money by taking this alternative route.
- The Interstate 10 corridor (especially between Phoenix and Tucson) is very congested and often dangerous (particularly in the areas where the freeway has two lanes in each direction). Rather than creating a new freeway(s), I urge ADOT to finish its upgrades on State Route 85 and perhaps add lanes to I-8 and I-10 while improving rail capacity for freight and passenger service (a new freeway is not desirable for this region). Focus on improving existing highways while encouraging passenger (Phoenix-Nogales) and freight rail along this corridor.
- THE LAST ITEM ALONE SHOULD NEGATE THE I-11 PLAN.
- Do not build this interstate highway. There is no need for another highway in our region.
- There is not one desirable outcome to this project
- Please look at no-corridor option.
- Improve existing transportation facilities only for all modes.
- It needs to allow for improved economy
- Preserve vital habitat and threatened wildlife, ensure Tucson and Southern AZ is connected rather than be bypassed
- ALTERNATIVE ROUTE FOR ACCIDENTS/WILDFIRES
- Protection of wildlife corridors, national monuments, migration corridors, and habitat conservation plans
- There MUST BE NO I-11
- Expand existing I-10 and I-19 as needed.
- rail, rail, rail!!
- The existing maps don't show clearly the existing roads and highways in each section. Maps don't show small areas of important economic value for the region like Old Tucson Studios and Arizona-Sonora Desert Museum either.
- Do not build a highway just to benefit commerce at the expense of residents and the environment.
- no more highways commuter trains
- not to impact migratory route for animals along the southern border Buenos Aires game reserve , Ironwood National Park and Saguaro Nat. Park west. desert bighorn sheep have recently been seen in the Tucson mt. range , crossing from the Silverbell mt. range. Improve I-19 up from Nogales, keep trucks in the middle lanes only especially through town. then improve I-10 past Picacho especially. this area of I-10 has major dust storms up through Casa Grande and into Phoenix , these dust storms be worse if you dig up another highway along that same corridor. it's already very busy and visibility drastically reduced. pretty dangerous highway driving.
- Widening I-19 use and repair what you have stay away from wildlife refuges and national parks and forests.
- Protect our southern AZ desert
- Avoid impact on current environment
- Railway
- OPEN SPACE, MINIMAL HIGHWAY INTRUSION, DARK SKIES, QUIET ENVIRONMENT, NOT INTERSECTING CASA GRANDE WITH YET ANOTHER FREEWAY



- East, West freeways on west side of valley far more important than this freeway.
- Avoid subsidizing sprawl development & maintain or improve travel time to PHX Sky Harbor
- Expand transit and rail options rather than create a new freeway
- i-11 should avoid saguaro national park & the San Pedro valley
- avoid environmental damage
- creating a corridor between Wickenburg and Nogales to better important illegals does not support security or defense.
- PROTECT Nat. PARKS & Monuments (GREEN areas)
- Leave the Desert alone, there are enough roads already.
- Do not build it.
- PRESERVE AND PROTECT THE WILDLIFE AND ENVIRONMENT
- none, I do not believe I-11 should be built
- protect the natural environment (animals, plants, air, water, etc.),
- Stay home!
- No desirable outcomes. Find a way to widen I-10, even if it takes more time.
- Why should the people of Southern Arizona be inconvenienced so that Phoenix can have a by-pass? If you're going to build by-passes; build us one, too! I cry B.S.!!!
- Put in rail. Don't be so retrograde. This is the ideal place for rail. Straight shot from Tucson to Vegas. At 300 miles per hour! Bullet Train.
- Don't build it!!!! It will destroy pristine land and communitiies and it replicates extising routes. This is a "make-money" project for agencies and contractors, it si unnecessary and disregards the borader needs of Southern Arizona's citizens. DON'T BUILD IT!!!!!!!
- I oppose the bypass due to environmental impacts
- I 11 is not necessary
- Protect sensitive environments and wildlife corridors
- Avoid ruining sensitive areas
- I 11 Freeway is a HORRIBLE idea. Do not do it.
- Improve existing roadways rather than building new ones
- Wildlife corridor stays intact!
- improve Phoenix metro bypass options
- Don't build I-11
- I see no need for a new interstate.
- Do not take anymore land from wildlife! We must learn to protect all wildlife from homospiens!
- There are no desirable outcomes of building another freeway
- no new interstate
- Expand mass transit both locally and regionally.
- Enough with more freeways. It will not help our region for most Arizonans.
- The way this question is worded assumes that there are problems the I-11 Corridor will address. This biased approach to collecting public input makes the outcome of your process completely unreliable and in violation of the intent of public scoping.
- I do not understand your desire to fill in little dots. I just want to comment. You are making a mistake , an expensive one. Why not just widen I-19 to accomodate the needs. Please



do not tear our community apart and ruin our little art community that we love so much. How could you do that to us?

- This project is a ridiculous, unnecessary, complete waste of tax dollars.
- Sustainable transportation infrastructure that does not fragment the landscape further. Any new corridors should take into account wildlife habitat movement.
- relieve traffic on Highway 93
- Provide increased economic development for the region, encourage movement of manufacturing and other businesses, and jobs, to the region supported by increased capacity for future freight and travel throughout the State
- IF nuclear waste/Tar Sands oil is to be transported, then safety is top priority...
- preserve natural ecosystems and air we breathe
- Not cut through exsisting homes, ranches, or farms near the Tubac area.
- There is none. We already have i8 to get to west state.
- The best outcome would be for it to not happen
- First on the list is FIX THE INTERSTATE BETWEEN PHOENIX AND TUCSON makes me sick to see a 2 lane to 3 lane than back to a 2 lane from both directions !!! needless to say no one moves to the right so bottles neck because you have someone going about 60 on the fast lane were there is a two lane !!!
- Another option for the I-10 traffic around Phoenix
- environmental impact reduced
- None
- None
- No interstate 11. We live where we do to avoid the business of town.
- Please consider wildlife!!! (animals, plants, tortoises, reptiles, birds, etc.)
- No interstate 11 built in my backyard.
- Your questions assume that there are problems that need to be solved by constructing a new road in this corridor. I don't see that those problems exist.
- Improve transportation reliability and efficiency while minimizing future maintenance costs.
- dont sacrifice more joshua tree parkway and burro bridge cnyn
- link to MC85 (east-west) to serve Buckeye & Goodyear via Southern Av Superstreet corridor which needs to be part of the plan. East - West traffic is served only by I-10 now. This fwy will not be adequate in the future as the sole east-west link, because of growth that is already planned. Superstreet needed. Southern Av is best.
- It threatens security. NAFTA
- None. This corridor will ruin desert landscape, wild life corridor, quality of CAPE recharge system
- we have I-19 widen it. It will be alot cheeper!!!
- Semi truck corridor
- Establish the southern-most section in the USA of the CANAMEX Corridor between Mexico & Canada, through the Mountain West.
- Realign existing UP railroad line in Nogales
- Preserve the tranquility of the environment
- acces to mass transit
- Stay in populated areas and leaver rural areas alone



- Get Border Patrol involved to have check points
- All the above "ideas" are BULLSHIT EXCUSES
- bring more commerce to Wickenburg area
- Improve safety on I-10, the most dangerous highway in the US
- To not disrupt existing communities; use government land as much as possible
- freeway (no tolls no lights) from Nevada to I-10
- Decrease time it takes to travel throughout the state.
- Mitigate effects of heavy traffic on Green Valley
- I feel this new route is a horrible idea. We do not need this, we should focus on improving I-10
- Make the CAP Trail crossing on I-10 possible.
- They should definitely build the interstate on the west side of Tucson it is cheaper and less land to be taken up in the long run
- Providing a north south corridor in an interstate system style with a limited access facility.
- I don't see how a freeway to Nogales would help homeland security. I agree with this project from Casa Grande north only!
- Enhance development of northwest Maricopa County and southern Yavapai County.
- Development will follow suit which will be great!
- Resurface I-10; employ routes that are the most sustainable, such as a rapid transit rail system between Phoenix and Tucson.
- more freeways is not compatible with a desirable outcome
- Bypass congestion in central Tucson. Provide alternate route to I-10 during dust storms, accident closures, or construction.
- No I11 at all unless it uses I10
- Should not be built. Money better spent on local infrastructure and schools.
- Develop transportation system that encourages smart growth and supports economic development
- This would have minimal desirable outcomes for me
- Please keep the natural desert beauty. If you must bulldoze vegetation please replant them back in or near their area before being uprooted.
- Avra Valley in Tucson really needs infratsturcture and this is a great fit. As a landowner in the area, i am thrilled at the possiblity of improving the quality of life in Avra Valley/Marana. And it is vital to relieve the congestion on I-10 to Phoenix.
- Protect wildlife corridor from TNP(W) to mtns west.
- No more \$\$\$\$\$ infrastructure for cars and trucks. Please.
- Separate freight traffic from other public road use.
- Protection of Saguaro West.
- Spur economic development by enhancing logistics operations between Mexico & Arizona
- None of these are problems I am concerned with.
- A solid east to west route thru tucson city
- We dont want it. We live in a area with two freeways already. Dont bring this into our neighborhood
- Avoid existing populated areas and go through wilderness
- The new highway should accommodate all of these needs.

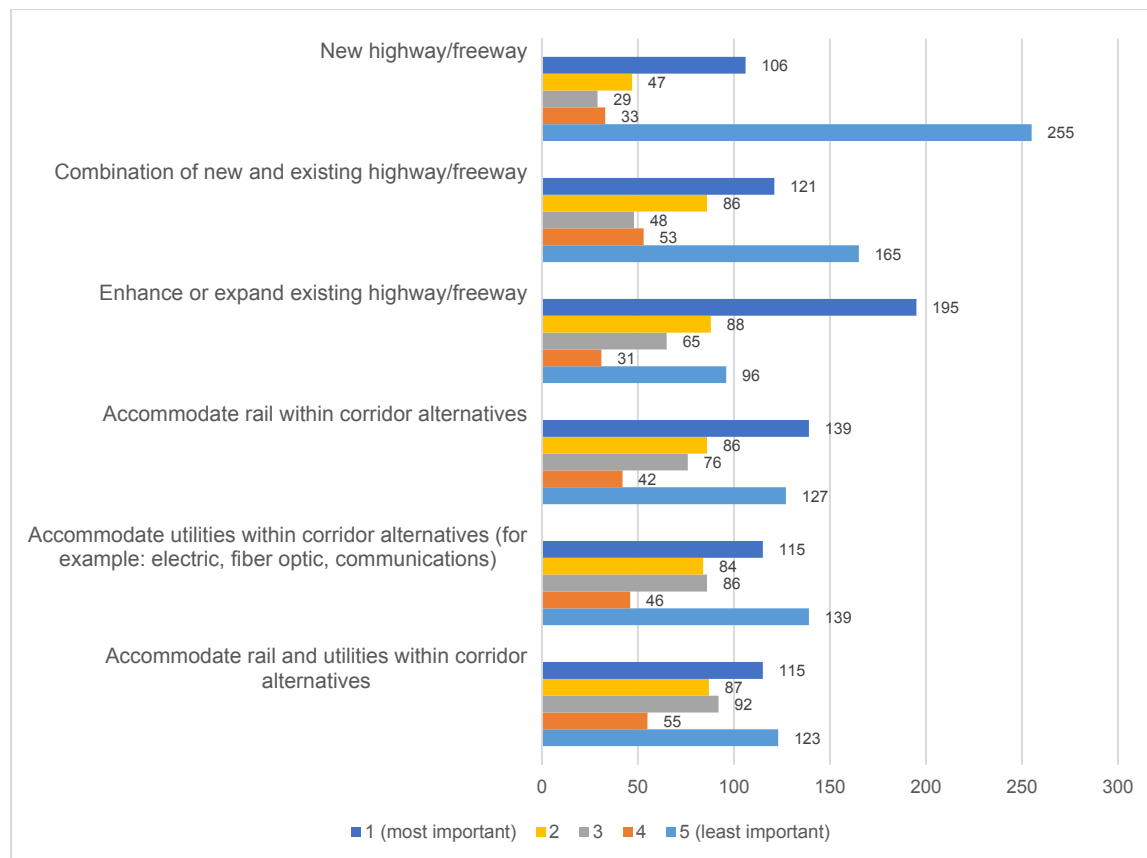
- Provide alternate route during I-10 closures/delays due to fatal accidents
- include noise abatement to offset increased traffic
- Least environmental impact
- No desirable outcome from driving 30 min to get close to where we need to go, takes 20 min now
- This road will only bring more people to live on the desert and exploit the few resources left here.
- We do not need additional environmental encroachment into our Desert ...
- This crosses 2 of my properties my house and the house my daughter lives in, I don't like it
- We need growth in Buckeye AZ. Would like to see I-11 for the proposed Douglas Ranch. Also would like to drive into Canada
- To relieve some congestion on I-10 between Phoenix and Tucson
- Separate 18 wheeler traffic; ensure commuter rail is included
- Environmental & historic preservation
- Less pollution
- By-Pass for Tucson and Phoenix
- safer route traveling from Wickenburg to Nogales. Loss of truck traffic.
- NONE, that are desirable, kinda like another MASSIVE open pit mine Run by some Foreign Country
- None, that I can see
- I DO NOT WANT OR NEED A FREEWAY IN THIS CORRIDOR! Your survey is leading and i will not allow you to put words in my mouth.t
- MASS TRANSIT
- Most important that no more natural landscape destroyed by unnecessary new route
- stop building highways. need TRAINS.
- Least number of corridors - save our natural resources.
- preservation of open space, alternative regional transport options
- passenger & freight traffic by rail will solve all of these without another deadly interstate
- For so many reasons, the route West of Wickenburg would be the best. It disturbs the least private property, goes along an existing route (Vulture Mine Road) and is the most level. Thank you
- Instead of a new parallel freeway in this corridor, why not improve the ones already there?
- preserve or enhance current wildlife and desert environmental protections.
- No freeway in that lovely desert area.
- Safety. May 26, 2016 another 18 wheeler accident involving 3 semis on I-10. Thankfully no serious injury. Time to get the semis off I-10. I-10 can no longer handle the amount of vehicular traffic between Tucson and Phoenix. Reduce traffic on I-10 through Phoenix. Most recent Auto Insurance Center study deems I-10 the most dangerous US highway.
- Reduce conflict between trucks @ 65mph & vehicles @ 75mph
- Eliminate restrictive highways and dangerous travel between Phoenix and Las Vegas.
- Need better access to NE-E Tucson
- We will lose all of our land. The problems with illegals and drug smuggling will now have a freeway to travel on (bad idea). NO ONE out here want's it our taxes will go up, our beautiful area will disappear. DO NOT WANT!!!!



- The proposed corridor, like many before will take lands such as ours, rural communities and farming areas, blm lands and wildlife will be affected. The proposed Maricopa area route is unnecessary and not relevant. We have minimal use age of I-8. These questions are not reasonable and don't give our opinions, they give us options of the only options you provide.
- High speed rail between Tucson-Phoenix,
- Provide better infrastructure for a growing Tucson suburban community.
- Not exactly primarily - but an interstate is needed that skips Phoenix, yet heads for Northern Arizona (connecting Southern Arizona)
- Spurring economic development
- Improve safety along us 93
- Increase utilization of existing roadways
- I see no need for another interstate highway in southern Arizona.
- no desirable outcomes, just more carbon footprint.
- Improve safety of US93. Most dangerous road in Arizona.
- trade
- Why are there no comment sessions in Northern Arizona? This project does not help the congestion on I-17 or the failure of looking at alternate routes for this project through Page.
- Additional bi-passes around City's - mainly Phoenix and Tucson.
- Moving people and goods, not cars
- Provide different ways to get to Nevada

## Question 2

What should I-11 be or accommodate within the Corridor. Please rank the following in order of importance to you. (1= highest ranking [most important], 5=lowest ranking [least important]).



### Other (please specify):

*[responses not edited for spelling, grammar, or capitalization]*

- Planning and implementation of high speed rail should be the emphasis of this study.
- though I support enhanced passenger rail service between Tucson and Phoenix, there is an existing route, and I don't want to see it in the remote areas defined in your study area
- Accommodate rail & utilities within existing freeway
- Use rail that is already in place.
- How are the utilities and the rail embellishments really going to be any different than they are today? Really??? People won't use the train to get to and travel around Phoenix!
- Unsure if rail way reduces air pollution. However, if so then reducing air pollution.
- NO NEED FOR NEW I-11
- I strongly discourage ADOT from only considering the freeway(s) option for this project, but the very name of this project (I-11) essentially states the bias this project has towards new freeway construction. As I will reiterate in my next responses, any freeway that cuts across the desert and opens more areas for sprawl and development is not in the best interest of this region. Please consider using these funds to expand I-10 or to make improvements on State Route 189 in Nogales (e.g, adding traffic signals to protect truckers and other motorists or perhaps adding a low-level ramp to allow for direct truck access to I-19). I would also implore ADOT planners to consider developing passenger rail between Phoenix and



Nogales (relieving at least some traffic on Interstates 10 and 19) while also adding new tracks to existing railways to promote more freight movement. To be sure, truck freight dominates in the region, but perhaps a combination of civil engineering on the part of ADOT and tax incentives promoted by the State of Arizona/Federal Government could encourage greater use of rail by produce and manufacturing firms. No new freeways! Southern Arizona should not imitate Southern California! Growth in our region will happen, but please consider alternatives to only freeways and automobiles.

- MEXICAN DRUG SMUGGLING BIG RIGS IN MY BACKYARD--NO THANKS
- Please look at no-corridor option
- Improve existing transportation facilities only for all modes.
- I oppose I-11 unless it can be built entirely within the confines of human populated areas.
- We need to fix interstates 19 and 10 to handle all the commerce, not make a new who infrastructure. We desperately need a rail link between Tucson and Phoenix
- There MUST BE NO I-11
- Expand existing I-10 and I-19 as needed. Accommodate rail along existing I-10 and I-19 as needed.
- We need to insure existing wildlife will not be affected.
- No new freeway required. More trucks are not the answer. Improve instead current rail.
- place these utilities along existing routes to maintain cost , keep security issues to existing areas.
- Preserve the natural state of Arizona
- Why is 202 only going to 59th ave. on west side?
- promote most direct routes, promote solar
- Expand transit and rail options rather than create a new freeway. Expand existing freeway systems
- mitigate environmental impact
- Most people who live here are here because they wanted to get away from city life. None of what you're offering has any appeal. If it did we wouldn't have sold everything to move here.
- Mass Transit TRAM between Tucson/Phx. & North
- Leave the Desert alone, there are enough roads already.
- Accommodate wildlife and their movement within corridor.
- ACCOMMODATE THE WILDLIFE; PRESERVE THE ENVIRONMENT
- No more pavement and power towers!
- If I-11 must be constructed, incorporate as many other uses as possible into the corridor to avoid additional land disturbance.
- Again; I see absolutely no advantage to the residents of Pima County in this plan; NONE. Just ten more years of torn up freeways and delays. The only reason you're doing ANYTHING here is to alleviate traffic in Phoenix while you build THEIR BY-PASS! AGAIN, I CRY B.S.!!!
- Put in rail only. We have to stop using fossil fuel. Cut cars.
- Oppose the I-11 bypass on environmental grounds. Do transit on existing roadways instead.
- do not build
- preserve areas free of noise and pollution
- Accommodate utilities, rail, communications within EXISTING freeway corridors only.
- What about expanding existing rail infrastructure?
- wildlife migration corridors
- Humans and animals need wild untouched lands. Animals need wildlife corridors to find food, water, mates. Please don't build a freeway through one of our country's last wild places.

- No shooting wildlife from the train--don't build anything that negatively impacts wildlife
- There is no need for another freeway
- This project makes ZERO sense and is a total intrusion and unwanted development along the Santa Cruz river and local communities who already get where they need to go with existing road ways.
- Accommodate wildlife movement (overpasses, underpasses). Utilize existing structures as much as possible.
- Internet and power lines upgrade
- Rail is good IF also for passenger. I do not like just freight and NO hazardous materials. Please notify the public if nuclear waste from Palo Verde or Tar Sands from Canada will be transported along the I-11 rail corridor. We need to be assured of the safety for the communities, watersheds and environment along that corridor.
- I live in Tubac.. just widen I-19 in this area. otherwise you are wasting money
- work with what we already have is best option
- Mass transit with the fastest route from point A to point B that does not harm the environment, wildlife or people's homes and businesses in the process.
- Use existing I 10 corridor to avoid the exorbitant costs of a new roadway and avoid disrupting established wildlife and rural areas
- Use existing I-10 corridor only, not through Avra Valley, to avoid disrupting established wild life and rural areas
- No interstate running through marana/picture rocks/ avra valley
- Please consider wildlife- they keep getting pushed out of their habitats
- It should only consist of improving the I-10 and US 93 portions within the proposed corridor with as little new highway/freeway as possible. The existing I-10 I-17 and I-40 corridors need a significant amount of improvement before we should be diverting transportation funds at a "new" corridor that will further thin funding for maintenance.
- Accommodate wildlife corridors to allow animal migration through the route
- utilize barren desert between tonapah, agula, yucca areas not existing scenic byway
- Keep this away from residential areas when traversing rural spaces.
- Use of existing interstate routes in currently rural areas such as I-8 should reduce costs through southwestern Pinal County
- Do nothing. Use what currently exists.
- Light interference for Kitt Peak Observatory and ruin the audio ambiance of Saguaro National Park West and Tucson Mountain Park.
- widen I-19 !!!
- Do not starve other highways of resources.
- Stay in populated areas and leave rural areas alone
- Need Border patrol checkpoints
- At a time to support America & American made Products to improve America economy, this does NOTHING FOR THOSE NEEDS> it only helps Mexico..
- Travel safety, let's not create another I-10 death zone ... Cross lane barriers are a must
- Accommodate the residents of existing communities
- turn 93 and 85 to freeway and expand I-19 and other existing freeways to meet additional capacity
- Accommodate high speed rail.
- Again, the plan ruins what makes Arizona special, namely the Saguaro National Park, Ironwood National Monument. This is a terrible idea.
- Train track on the west side of Tucson would be fast and easy to service
- Employ RTT- Rapid Transit Trains between Phoenix and Tucson.

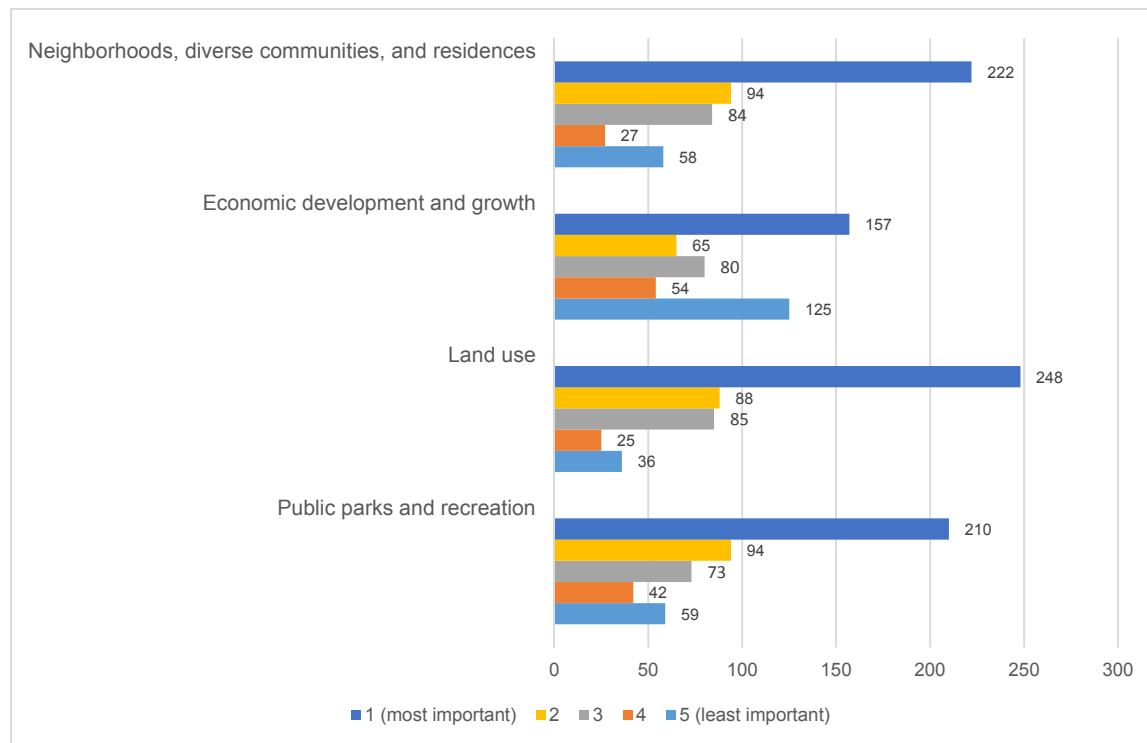


- Any new corridor should accommodate expansion of highway and utilities, to prevent creating more corridors in future.
- Highway should not be built. A waste of money and destruction of valuable desert, wildlife and environment.
- Arizona's economy would be greatly benefited by rail and road connections between I-40 and I-10. A rail and highway connecting between population centers is imperative.
- I prefer improving existing routes and mass transit
- make it a "scenic drive" alternative freeway through the exotic desert.
- please make this a separate road and do not combine it with the existing I-10. it needs to stand alone to be efficient.
- There will hopefully never be an I-11.
- Plant and wildlife habitats
- Provide access to Inland Customs Port of Entry in AZ
- We dont need it. Or want another freeway. Keep it out of our neighborhood
- Use solar panels to generate electricity
- The corridor should bypass conested areas by following a route west of the Phoenix metropolitan area.
- The US needs a better north south corridor than I-5 in California. California does not maintain their freeways.
- We stopped the utility lines and gas lines to Mexico through Avra Valley, don't try again.
- Help spur growth and development west of Phoenix is important to us
- This freeway will only allow shipments from Mexico to flow more freely thru our country and reduce even more jobs for Americans
- We do not need another highway
- More business and cash flow through Buckeye AZ
- Do it right: include one footprint for complete growth: light or medium rail; separate areas for heavy freight; connect isolated communities (east Tucson). DO NOT DUMP new highways into existing: look at Hwy51 into Hwy 10...what a mess...if merging highways then create newlands on existing highways or what else is the point?
- Using as much existing highway as possible will save money. Only new link needed is the South Mountain bypass. From Wickenburg, 60 to 303 to new bypass to 10 to 19 are in place. Increasing lanes on existing highways will be infinitely faster and cheaper to complete.
- Reliable commuter rail (metrolink service)
- High speed rail alongside freeway.
- i-11 should be incorporated in existing highway system or as close to existing highway as possible.
- If I want more Freeways, I will move to LA or Dallas,, HELL NO,, I moved out here to be away from Noise-Pollution- Diesel Fumes, & too many Faster Roads,, HELL NO.
- Please keep this from destroying the AVRA Valley
- I DO NOT WANT OR NEED A FREEWAY IN THIS CORRIDOR! Your survey is leading and i will not allow you to put words in my mouth.
- Use existing corridors from 10 and / or railway tracks or powerlines
- WE NEED TRAINS, not highways.
- a nice light rail spur from Casa Grande to Phoenix would be nice
- Spend resources on making I 10 and I 19 better, then add a new connection from Buckeye up to Las Vegas and beyond
- expand or enhance current highway system without building any new systems.
- No to I-11 freeway.

- if necessary, double-deck I10 (see Houston Texas)
- A new highway would be preferable to alleviate I-10 BUT only if it can be built to avoid environmental factors. Don't desecrate what exists in order to move traffic.
- light rail is a must for the tech park
- Again, not our desires. The corridor will lead our people 30+|- east or west to still get out of Maricopa.... Not reasonable. We have roads that are rarely traveled for the access. The problem is a city in the middle of wilderness areas, blm and Indian reservations. Leave rural rural and you won't have congestion problems. I-17 didn't relieve traffic, nor the 43, nor the 202, 101. All it did was made room to destroy more rural communities, public lands (in this case) and communities.
- Oil pipeline, high speed rail
- Expanding existing corridors is not really helpful for the Tucson metro because existing highways do not solve local problems at all. I-19 moves traffic south of Tucson and 10 is mostly a through way, getting around the metro is restricted to surface streets or a handful of state roads like 86 and 77. Another freeway would go a long way to help relieve congestion.
- There is no need to build I-11
- We need light rail between Tucson and Phoenix.
- no new highway/freeway. improve 1-10.
- Main rail route will still be I-40.
- cancel I-11 continue I-17 north and give Northern Arizona better access. Page is left out of this project.

### Question 3

The study will evaluate and consider the potential impacts on many human environmental factors. Please rank the following. (1= highest ranking [most important], 5=lowest ranking [least important]):



#### Other (please specify):

*[responses not edited for spelling, grammar, or capitalization]*

- It is our duty to preserve natural & open land for the enjoyment of future generations. It is our responsibility to prevent Pima county from becoming an over-crowded polluted blot on the landscape which metropolitan Phoenix is.
- Minimizing the impact on national parks, state parks, and national forests should have the highest priority.
- Maintaining a pristine desert with the current ecosystem and wildlife.
- preserve pristine areas
- Wildlife corridors, at-risk species, conservation lands, noise, light and air pollution.
- The Avra Valley corridor will impact communities that have the least political voice.
- With the public p-arks and recreation are we going to let Suzie and little Jimmy go play in the freeway?
- All are equal in my eyes. If one could be the most it would be Economic development and growth.
- Land conservation in general in corridor (preservation of protected lands like Saguaro Natl Park and Sonoran Desert Natl Monument as well as open spaces throughout the corridor as our region's natural character is worth protecting)



- THE I-11 PROJECT HAS NOTHING TO DO WITH PARKS & REC & RE LAND USE IT IS TOTALYY A WASTE OF GOOD LAND,, GET REAL, THIS IS BULLSHIT
- Consider the irreparable damage to the reservation, Saguaro NP and Ironwood Forest NM.
- This corridor should be managed in its current natural-values state. This would devastate the character of southern and central Arizona.
- I can't support this road going through the desert at all. I care about community and peoples' backyards. Indeed, if the road goes in, my grandchildren will move away. But a road for society must be borne by society, not a small incredibly rich habitat that cannot be replaced.
- There MUST BE NO I-11
- Environmental considerations most important.
- need for use of non-fossil fuel for energy
- Analyze current economic values (tourism, outdoor recreation) vs. projected economic values (?) at county or state level.
- We should not sacrifice our lives for the crass benefit of commerce. Residents would pay too high a price.
- water resources, wildlife
- the way the land is utilized will play a big impact on the environment . create more dust and increased temperatures. natural., tourism is one of Arizonas biggest industries.
- Protect what we have.
- use current 1 10
- OUR STATE IS BING RUINED WITH TOO MUCH CONCRETE
- Waste of time and money for this freeway.
- natural vs government planned/subsidized growth
- minimize the impact on our parks & natural spaces
- Environmental impact & wildlife corridors
- No, no, no.....take your interstate somewhere else!
- Leave the Desert alone, there are enough roads already.
- Do not impact the natural land and animals
- LEAVE IT ALONE. WE ARE LOSING OUR OPENSACES AND STARTING TO LOOK LIKE CALIFORNIA
- environment
- Humans should stay home in their artificial environment!
- Using I-11 as a tool for economic development will encourage more growth, and more need to future highways. Some people are glad about this, but I oppose the concept of growth begetting growth. Instead we need to develop better solutions within the space of our current infrastructure.
- wildlife impact, expense
- Air quality. Climate change. Global warning. 120 in Phoenix. PUT IN RAIL
- I oppose the I-11 bypass on environmental grounds. Enhance and put transit on existing roadways instead.
- open undeveloped space least amount of water use
- Overpass and underpass for wildlife always!
- The new freeway will block access to National Park and National Monument

- Protecting wildlife
- access to public land, hiking & OHV trails
- Why are we ramping up traffic to an extremely rural area where residents DO NOT want this and DO NOT need to use the little precious land left between Tubac and the river with a major roadway. It's extremely distressing and disturbing to think we will be sandwiched between 2 major roadways in an area where people go to be off the beaten path. Residents of this area DO NOT WANT to be sandwiched in a very narrow strip of land between two major roadways.
- Do not spoil existing residential neighborhoods
- Mostly, I would like an end to the "west side" being developed in just industrial modes. The West Valley of Maricopa County is just as beautiful and is just as worthy of quality development as the East Valley historically has been given. The Sonoran Desert NM and the Vulture Mine area needs to be beautiful if the I-11 indeed traverses it.
- Tourism in the town of Tubac
- me :)
- the parks have come to first
- Impacts on Wildlife and native plants most important and then people's homes and businesses.
- undesirable effects on neighborhoods and national parks
- Consider long term and established culture such as rural lifestyle here. Specifically by people in Avra Valley. We didn't move way out here to have a freeway plowed through our neighborhood.
- Avra Valley, as it is now, would not survive the corridor, and there is another alternative with space along that route (I-10) for the I-11 corridor
- You will be destroying farms, wild desert and the security of the current residents in Marana! No Interstate 11!
- Again, your questions are completely biased.
- The corridor should not be a mechanism for new economic development and growth but only serve to improve the efficiency of the existing economy. Facilitating new economic development and growth along the corridor will immediately lead to increased congestion on connecting corridors and eventually result in congestion on the subject corridor, which completely defeats the entire purpose of establishing the corridor.
- Wildlife corridors
- utilize unpopulated area btwn Tonopah, Aguila, Yucca instead of 'expanding Phoenix valley metropolis'
- Ruin western view of all those who visit from around the world ruin, if not totally destroy wildlife life. It would further destroy quality of air, creating severe air pollution.
- we have a interstate to Nogales, widen it!!! Improve it!!! 1st!
- Get to where we are going faster with less congestion - and provide shorter alternate routes in times of emergencies.
- Use existing right of ways by extending and keep truck traffic in slower 2 lanes
- Traffic congestion on I-10 in central Tucson must be reduced with commercial and pass-through traffic shifted to an alternative freeway west of Tucson Mtns in Avra Valley
- Noise impacts
- what are the general benefits. Is rail a priority, rail as in Oregon.

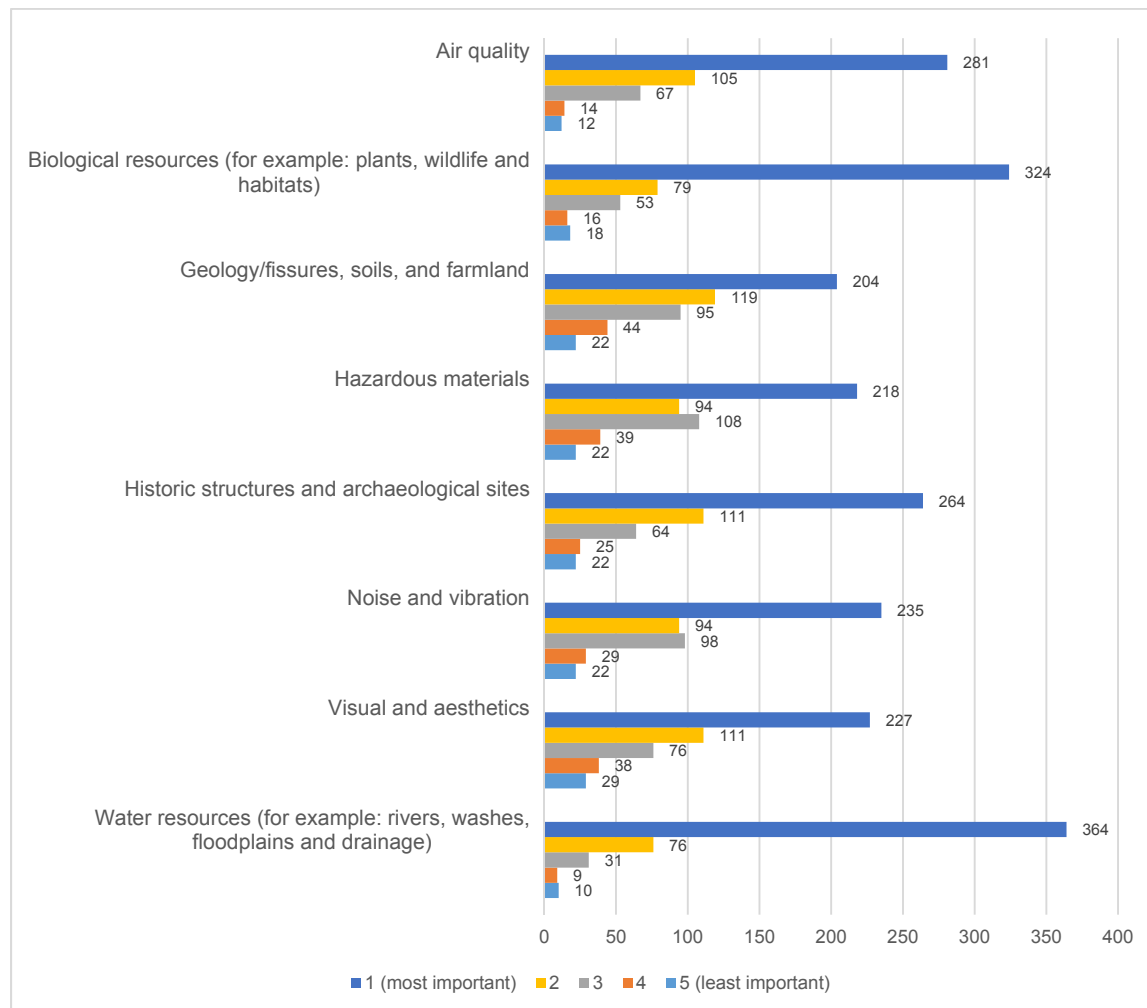
- We moved out here to get away from city and hwy noise and this will defeat the purpose
- Stay in populated areas and leave rural areas alone
- Allow ONLY land OWNERS of the effected route VOTE , yes or no,, no outsiders should decide what will , in the long run, be a ruin to the Avra Valley,, We live here for what it IS-- we do not want a Los Angeles Smog filled valley,, NO NO NOO
- Cross lane barriers should added to both new road and I-10, at current travel speeds nothing else works
- Avoid neighborhoods that already have interstate through them
- just make the traffic flow better from Vegas to I-10 and improve traffic flow on I10 and I19
- Use the most direct route throughout the area regardless of land use.
- Please do not spend our road money on such a project. Let's focus on using the funds to keep our existing roads workable and expanding existing highways.
- CAP Trail crossing of I-10 for bikers, hikers and horses.
- The water for the recreation is already on the west side of Tucson
- We are an irrigation district south and west of Casa Grande, AZ. from the study area map, it appears the proposed route will impact the federal right of way of our canals and laterals. This must be considered early in your planning.
- Be sensitive to encroachment on Native American reservations.
- Don't build this highway.
- Land Use and transportation corridors must be simultaneously considered. USDOT and smart growth require integrated planning of land use and infrastructure development.
- In Avra Valley there is such limited area left that a corridor thru there will impact Saguaro NP, Ironwood Forest NM, Tucson Mtn. Park (Arizona Sonora Desert Museum), Tohono Oodham tribal farms and Ryan Airfield. .
- Development of new land and growth must be limited due to water and air quality issues
- Impact to sacred sites of the Tohono O'odham Nation, air quality studies for the community of San Xavier,
- The proposed I-11 route by Sandario will displace 100s or even upwards of 1000 people. We love living out here where it's peaceful and quiet. If we wanted traffic and amenities, we would live in the city.
- the impacts will mostly be positive for our area. parks will be preserved and will have more access for the public.
- Protect wildlife corridor from TNP(W) to mtns west.
- We don't want the I11 in our neighborhood.
- Avoid as many existing homes and communities as possible.
- All impacts are very important.
- Wildlife corridors and archeological sites will be ruined.
- The freeway should not happen. If it does, the far west location should be used so Tucson is not cut off from the Saguaro Museum.
- Leave the desert alone
- Noise abatement
- Open space preservation
- All we ask is this--TAKE A VOTE OF THE RESIDENTS IN THE AREA THAT WILL BE AFFECTED --THOSE ONLY,, not some asphalt executive or a trucking company manager,, ASK THE RESIDENTS & LAND OWNERS,



- I DO NOT WANT OR NEED A FREEWAY IN THIS CORRIDOR! Your survey is leading and i will not allow you to put words in my mouth.
- Again...use existing highway or railways
- Include "preserves" with parks and recreation
- an interstate will not benefit any of these, but # 2
- The corridor west of Wickenburg would not interfere with the planned Maricopa County Regional Park in the Vulture Mountains encompassing the Hassayampa River Preserve. It would have the least impact on the Hassayampa River.
- A new parallel freeway would be unnecessarily destructive
- wildlife habitat and natural desert preservation
- The existing communities need to be left alone, we are a separated community and that's that. Wilderness, blm, Indian reservations..... Don't need a go cart track and it won't relieve the issue. We do not need economic development. We are a rural community surrounded by rural (as previously stated) this won't help or solve the issue. Land use should be as it is now, rural community, blm/wilderness (public lands) farming. No freeway! Parks have nothing to do with your freeway, we want no parks, we want no freeway. We have public lands and we use them. We live rural, we farm.....
- Diverse Communities? What does that even mean? We want to get around more easily.
- There is no need to build I-11
- The construction and impact will destroy archaeological non-renewable resources
- I-11 will negatively affect parks, monuments and tribal lands.
- humans need to design for less roads, not more
- Need to respect existing park and preserve lands in the corridor
- Environment?

## Question 4

The study also will evaluate and consider the potential impacts on many natural environmental factors. Please rank the following. (1= highest ranking [most important], 5=lowest ranking [least important]):



### Other (please specify):

*[responses not edited for spelling, grammar, or capitalization]*

I-11 will most certainly increase urban sprawl

- The new freeway would destroy valuable habitat and historic and archaeologic sites. Other states have added dedicated lanes for large trucks and avoided the extra costs of a new right of way. Expanding the current freeways would be the smartest move.
- We DON'T need I-11!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
- NO NEED FOR I-11 THRU YOUR STUDY AREA
- As stated in my answer to #7, conserving Arizona's natural resources (clean air, wildlife, and natural spaces) is critical. While at this stage the I-11 Project has not nailed down a specific path for any potential new freeways/highways, the general geography of this corridor greatly concerns me, particularly south of Interstate 8. I think building a completely new freeway cutting across Sonoran Desert Natl Monument and Saguaro Natl Park (as well as

undeveloped desert lands west of I-10 and I-19) would be detrimental to the quality of life in Southern Arizona. This region will grow, but it should not develop the way in which California's Inland Empire (Riverside, San Bernardino) developed with countless freeways and sprawl (much of which is actually vacant in 2016). The comments made by ADOT in local media suggest that a new freeway(s) is preferred for this project. I would like to reiterate that constructing a new freeway south of I-8 would be profoundly detrimental to Arizona communities in the long-term. Our natural landscape, wildlife, and the environment will not have a political say in this matter, but keep in mind that those things make Arizona what it is - destroying our heritage and adversely affecting our natural environment will have irreversible repercussions for our region.

- EVERY ONE OF THESE ISSUES ARE THROWN IN THE GARBAGE BY THE I-11 STUPID PLAN
- Consider the loss of the rural and agricultural nature of the Avra Valley.
- This would violate the current values of this wild and natural area.
- I-11 would negatively impact all of the above
- I-11 would simple be an ecological disaster with zero benefit for Tucson
- There MUST BE NO I-11
- Wildlife corridors, dark skies, environment most important.
- low water use is vital. Pick energy source with low water use.
- Evaluate impacts to landscape connectivity, wildlife corridors and migratory routes.
- Overall, the environment would suffer greatly.
- where are the hazardous materials coming from? alot of this area you are talking about is the same pristine , unspoiled , natural enviornment as before the united states were founded. once you put a highway through it that is gone, forever.
- You are considering putting I-11 through a flood plain , a valley where there are major dust storms ,also migratory paths for wildlife .
- Wildlife Corridor and Astronomical Light Pollution
- Impact to the major aquifer serving the greater Tucson area
- Major Spills within the Avra Valley Aquifer
- WE LIVE IN THE MOST BEAUTIFUL STATE - LET'S NOT RUIN IT WITH MORE INDUSTRIAL FEATURES. WE NEED TO PRESERVE OUR ENVIRONMENT AND NATURE
- do not promote population relocation and external social costs
- Having semi trucks spewing pollution, having hazardous materials quickly rushing past my house.....not the look I was going for.
- Wildlife corridor disruption
- Leave the Desert alone, there are enough roads already.
- WILDLIFE
- Leave the desert alone!
- Especially water, which is scarce already
- Corridors for interrelated ecosystem functions (wildlife, water, vegetation, etc.) that will be interrupted by a new highway and the resulting extended development.
- Not a desirable thing. Too damaging to nature and the environment. Leave it as it is.
- Rail solves all these problems.
- I oppose the I-11 bypass and support enhancing existing roadways with high-capacity transit instead.
- do not build we do not need another interstate
- A new interstate would be devistating to the natural environment.



- I-11 Survey Monkey  
Summary of Public Scoping Responses  
Page 20

- In Avra Valley there is such limited area left that a corridor there will impact Saguaro NP, Ironwood Forest NM, Tucson Mtn. Park (Arizona Sonora Desert Museum), Tohono Oodham tribal lands and Ryan Airfield. .
- Use of existing routes will minimize impacts on these factors
- We have already destroyed so much of the desert and should not destroy the habitat of the wildlife here. We have big horn sheep in the Tucson Mountains. We have pygmy owls coming to our backyard every night. The owls were on the endangered list but because they are more abundant in Mexico, they were removed. The big horn sheep are also endangered. We need to keep this area as pristine as possible.
- there will be some impacts that will be offset by reducing traffic on I-10 to Phoenix. it's ok that there will be some noise - our area will be greatly improved
- Protect wildlife corridor from TNP(W) to mtns west.
- Wildlife corridors
- Leave our lands alone, stop destroying them for the sake of progress. We don't need or want a freeway in our neighborhood.
- Save homes, farmland and archeological sites, first.
- All environmental impacts are important.
- Connectivity of wildlife habitat between Tucson and Waterman Mts.
- I-11 would be cutting through Brawley wash area, not important to you, maybe to the aquifer. Very expensive to build bridges.
- The Oro Valley area is congested already. Adding an I-11 intersection to that mess will be horrible and divide Tucson in a detrimental way.
- Design to reduce heat factors; protect water; build canal from Phoenix to Tucson in same footprint.
- You want smog--Move to Phoenix or Los Angeles-- we,, those that live out here DO NOT WANT MORE SMOG, NOISE, POLLUTION FUMES.
- Wildlife corridors
- I DO NOT WANT OR NEED A FREEWAY IN THIS CORRIDOR! Your survey is leading and I will not allow you to put words in my mouth.
- making highways and overpasses "pretty" doesn't help, NO NEW ROADS, we can't even maintain those we already have....
- Keep our environment healthy -- keeps us healthy
- hazardous materials, seriously?
- Again, the West of Wickenburg route would have the least impact on the Hassayampa River which is the main source of water for this entire area.
- Local, regional and federal preserved and protected lands.
- As harsh an environment as the desert is, it is also a fragile system.
- I will say it again, no more people sandwiched between reservations, BLM, wilderness. Let us be rural, leave the lands alone, protect and preserve wildlife and areas.
- Avoid more development that will increase water usage
- Avoid views of ugly wind mill farms if any.
- There is no need to build I-11
- I am most concerned about the destruction of archaeological sites
- this seems quite evident, doesn't it?
- should not compromise existing land and water use planning, or currently protected sites and environmental regulations

## Question 5

Identify the areas or resources within the Corridor Study Area that you feel must be avoided or are important to consider (open-ended response).

*[responses not edited for spelling, grammar, or capitalization]*

- I fail to understand why planners do not consider beginning I-11 off state route 85 to I-10 just south of Buckeye. This would serve as an ideal by-pass.
- Buenos Aires National Wildlife Refuge, Saguaro NP, Ironwood Forest NM, Coronado NF, Picacho Peak.
- All parks, monuments and undisturbed natural lands. Stick to existing highway (I-10 and 19 as much as possible
- All of it. I am vehemently opposed to I 11. We should be trying to reduce trucking and traffic on the interstates by building infrastructure such as commuter trains and utilizing planned vehicle trips to even out the the traffic jams on the current roads. Goods should be made and food should be grown closer to where they are sold to minimize road traffic.
- Wildlife linkages and watersheds
- Existing neighborhoods; sensitive natural areas.
- Must avoid further fragmenting the natural world around the corridor area. Avoid especially the Desert Museum, Ironwood National Forest Monument, Saguaro National Park. There is just no place for I-11 west of the Tucson Mountains.
- wilderness area, national monument. Wildlife corridors
- The Ironwood National Monument, Saguaro National Park West, Arizona Sonora Desert Museum, The Indian Reservations, The Casa Grande National Monument, and all of the natural wildlife corridors.
- Designated wilderness areas, national monuments, national parks, and the CAP wildlife mitigation corridor must be avoided.
- Avoid building through national parks and monuments, as well as through tribal communities. Utilizing and possibly expanding currently existing Interstate 19 and 10 could help. Resigning Interstate 19 and cosigning with Interstate 10 makes the most sense here. Consider building north of Sonoran Desert National Monument, as well as building west of the Hassayampa River & Buckeye, which appears to be the least impactful.
- any undeveloped areas
- Tucson Mountains, Avra Valley, Ironwood National Monument, Picacho Peak
- All of it should be avoided
- No consideration should be given to the Avra Valley corridor. Refer to prior attempts to bring electric lines through the area and community response. It is important to consider using routes already in place like double decking.
- The I-11 is a bogus plan that is not going to benefit southern Arizona, Arizona as a whole, or the general economy in any meaningful way, unless it's just going to create some busy WORK for people to think they've got a meaningful job..... Ha, ha, ha!!!! Good LUCK! This is NOT worthwhile in any real imagination!
- The Bureau of Reclamation Tucson Wildlife Corridor; Saguaro National Park; Tucson Mountain Park; existing residential communities in Avra Valley
- Many Tucsonans have family members up north and if travel, cost reduction, reduction of air pollution could be decreased I feel it would be a benefit for society.
- DO NOT DISRUPT THE DESERT IMPROVE ON EXISTING FREEWAYS



- This project must preserve as much of our natural landscape and resources as possible. Penetrating Sonoran Desert Natl Monument or Saguaro Natl Park is unacceptable as would be opening up large areas of undeveloped rural land - does our State truly have enough long-term water resources to encourage urbanization of extensive undeveloped? This Corridor Study ought to focus on improving State Route 85 and Interstates 8, 10, 19 while strongly considering rail improvements. Conserving Arizona's natural resources needs to be a priority for this project.
- THE ENTIRE VALLEY SHOULD BE OFF LIMITS USE THE EXISTING 10/19 AND WIDEN THAT MESS
- Saguaro National Park. Ironwood National Monument Desert Museum. Red Hills Information Center Tucson Mountain Park Archeological and historical sites Kitts Peak doesn't need the light pollution. The environment doesn't need the noise and air pollution. If we wanted a Phoenix we would move there. There was talk for many years about closing or making Picture Rocks Rd due to the pollution effects on the Saguaros and now you to put an freeway in? Someone is obviously going to be making big bucks on this. It doesn't even make sense
- Part of the study area for the Environmental Impact Statement includes Avra Valley west of the Tucson Mountains. I am opposed to a new interstate through this important biological area which includes numerous wildlife linkages, is adjacent to Saguaro National Park and Ironwood Forest National Monument, and contains critical riparian habitat.
- Choose No Action. We don't need another highway.
- All areas in the Avra Valley corridor must be protected and these include animal migration patterns, Saguaro Nat. Park, and Iron Wood Monument. Putting I 11 through this area will destroy these areas. I much prefer expanding and double stacking I 10 and adding mass transit instead.
- Sonoran Desert, National and State parks, wildlife refuges
- Please PLEASE do not choose a route that spoil the land between the Tucson Mountains and Sandario -- it's the last area of Tucson that has not completely fallen to the developers.
- Avra Valley
- The wildlife corridors recently documented between Ironwood Forest NM, Saguaro NP and perhaps the Santa Catalinas.
- From the US-Mexico border north to Tucson is totally unacceptable route, do to the cultural and natural values there. NOTE: The link to the study map took me out of my original survey (poor usability).
- all existing and planned parks, open spaces, trails, natural areas, historic areas.
- Sandario road from picture rocks to tohono boundary
- The Sonoran Desert should be avoided. It is a very small desert, as unique in the world as the Grand Canyon. Dissecting the desert with yet another freeway/highway cuts off the genetic pool on one side of the road to the other. It boxes in antelope, lion and so many other mammals, lowering the gene pool and invariably their numbers and health. Antelope have been wiped out over much of AZ already. If you build this road through this desert, I wager you will name it the Sonoran Highway. Because developments are most often named after the natural habitats they replace. Consider the road a memorial to the desert.
- The Avra Valley and other natural areas
- All of it....this interstate will impact people's lives, homes, wildlife, national park land, Native land and much more....We have stayed in this area 6 years and will be moving in 2017 to this area and will NOT be happy campers if this interstate gets the approval.

- I-11 is an unacceptable alternative
- Avoid Avra Valley
- We believe that a new freeway west of the Tucson Mountains would be a tragedy. It would destroy a large part of the desert flora and fauna unnecessarily and serve no useful purpose. We believe that expansion and improvement of the existing I-10 highway would be the best answer to future requirements.
- The biological connectivity of the different ranges. Why destroy an entire watershed . why not expand I 10 and I 19 and think rail in the same corridors.
- State trust land
- Link does not present a Study Area Map
- I do not want an I-11 Highway Bypass route in Pima County through the Avra Valley west of the Tucson Mountains. The environmental and community impacts could not be adequately mitigated. Please expand existing I-10 if necessary.
- AVOID BUILDING A MONDO EXPENSIVE NEW HIGHWAY THAT SHUTS DOWN FOR HOURS FOR A FENDER-BENDER--FOR DAYS FOR A DPS ACCIDENT
- Oppose putting new highway corridor in Avra Valley -- should utilize existing developed areas in smarter way
- Everything south of Eloy should be avoided, especially Ironwood Forest National Monument, Saguaro National Park, the Bureau of Reclamation's Central Arizona Project mitigation corridor, City of Tucson mitigation lands for their Avra Valley Habitat Conservation Plan, and Pima County mitigation lands for their Multi-Species Habitat Conservation Plan.
- All natural areas designated for conservation or recreation should be avoided. Additionally, all areas near these areas should be avoided, as wildlife typically need habitat larger than what is currently set aside. Finally, any areas home to endangered or threatened plant or animal species should be avoided, regardless of whether these areas are already designated for protection.
- There MUST BE NO I-11
- Wildlife corridors/habitat and recreational open space west of the Tucson Mountain need to be protected.
- Please do not build the proposed I-11, or in any other way use the proposed land area.
- Not in Avra Valley. Enhance I 10/I19 if necessary.
- Areas to be avoided: BLM land, Sonoran Desert National Monument, Saguaro National Park, Coronado National Forest.
- Historic downtown Wickenburg and scenic corridor of Vulture Mine Road near Vulture Peak and the planned Vulture Mountains Regional Park system.
- This corridor is unacceptable. It will destroy the area where we live, in Tubac, and also all the other communities in the Santa Cruz valley. It will have a very negative impact on the F. L. Whipple Observatory on Mt. Hopkins, where I work. Why are there no other corridors under study more to the west? If no, is it merely for convenience of ADOT not to have to negotiate with the Tohono O'odham?
- Santa Ritas,
- the areas of the southern route proposal Buenos Aires game reserve , animal migrate back and forth along that 2 lane highway, herds of deer, light quality issue for Kitt Peak also, coming up along the Ironwood nat. park would separate Saguaro nat. park west and Tucson mt. range from potentially more bighorn sheep migration , just recently seen. also very severe dust storms frequent this valley starting south along the mine tailings north west of

green valley and ending up at casa grande. very dangerous highway driving! If you do it please put wildlife crossings along the way. thankyou.

- Biological corridors (ID'ed in the Sonoran Desert Conservation Plan) need to be protected and preserved; don't run a new highway system through these vital corridors between mountain ranges.
- Avra Valley
- i looked at the study area map and do not see why anyone would consider impacting national monuments, tribal areas, and national parks. the only solution is the least impactful- enlarge existing transport corridors and include wildlife crossing and tunnel areas in them. future people will thank you for your good judgement and foresight. thank you.
- Sonora Desert, Tucson Mt. Park, Iron Wood protected area, Desert Museum and the desert in general. Don't destroy more of the Sonora Desert.
- AVRA VALLEY
- The view shed of Tucson Mt. Park, Saguaro National Park, Ironwood National Monument and the most visited by people from all over the world, The Arizona Sonora Desert Museum. The increase in noise pollution would greatly affect the public enjoyment of the above areas. The bisecting of a major wildlife corridor between the mountain ranges would greatly impact wildlife. I am very concerned about building a major highway over our aquifer. The impact to the rural setting of the Avra Valley cannot be mitigated!
- Whole I 11 project is un-needed
- This water aquifer feeds the City of Tucson and the Main stay of the Garcia Strip Community of the Tohono O'odham Nation. There is a 2300 acre farm located here. How does this impact the community and farm.
- Need to update I 10 Casa Grande to Tucson
- All areas in proximity to Saguaro National Park and Tucson Mountain Park would destroy the existing quality of those parks and itinerant recreation areas.
- Animal corridors, riparian areas, plant and animal species disruption
- Tumacacori Highlands, Santa Rita mountain, Avra Valley
- THE IDEA OF PLACING ANOTHER MAJOR INTERSTATE THROUGH CASA GRANDE IS APPALLING. THE TOWN'S WONDERFUL ENVIRONMENT IS BEING DESTROYED BY TOO MUCH BUILDING AND CONSTRUCTION. IF THE IF I-11 HAS TO BE CONSTRUCTED, THEN PUT IT OUT IN THE DESERT TO THE FAR WEST WHERE THE NOISE AND POLLUTION WILL HAVE THE LEAST IMPACT ON EXISTING COMMUNITIES
- Important to consider residential areas along proposed route and how they will be impacted.
- VultureMountains, Harquahala Wilderness, Aguila, McMullen Valley and aquifer areas
- Avoid areas where bighorn sheep and other species of wildlife live and migrate.
- The Avra Valley is a very sensitive area because of its proximity to Saguaro National Park and Ironwood Forest National Monument. Sonoran Desert National Monument is also a sensitive area. We should avoid placing any new highways near these resources.
- Saguaro National Park-Ironwood national monument San Pedro river valley, Cascabel Arivaca, Sonoita-Benson corridor
- Avoid building in the Avra Valley entirely
- Avra valler. Altar Valley, Coranado National Forest
- Wildlife migration corridors as mapped by Sky Island Alliance biologists.

- Stay as far as possible to the west. Wickenburg is the small town we all want to preserve. Not everyone is looking for "progress."
- Frankly, I do not see the need for Interstate 11 at all. However, if it is built, it is vital that our wildlife corridors and refuges be avoided. With thoughtful planning, it seems that we could add additional lanes to the already existing infrastructure of I10 rather than cut yet another swath of concrete through our open spaces, with the accompanying houses and businesses. Lets build smart. The days of building roads without planning for best accommodation for our precious and finite natural resources should be a thing of the past. We can do better than that.
- NOT through Natural Areas, Monuments, Parks, Historic Sites, Natural Habitats & Desert environments. No impact to water sources!!!!
- National Monuments, National Forest and native desert.
- Damage to undeveloped natural areas and could affect nearby natural areas such as Saguaro National Park. The effects on wild lands, wildlife, communities, air quality, water resources, and more could be significant. We must be better stewards of our lands. Stop catering to the all mighty automobile. I know jobs are your livelihood, your raises, your bonuses, your money, but do what I did for 40 and have two jobs to make up the difference. You don't have to build roads to put food on your table especially roads like this I -11 which will only bring gamblers to Vegas from the South. Isn't that what this is all about?
- The whole project must be avoided.
- These areas must be avoided at all costs: Saguaro N.P., Tumacaori Nat'l Park, Ironwood Forest. Sonoran Desert N.M., Coronado Nat'l Forest, Pascua Yaque Tribe and other tribal lands, existing neighborhoods, and other parks and recreational areas. I believe we have existing freeways that can accommodate freight and auto travel without destroying national treasures and pristine environments. Another freeway will be expensive and unnecessary in the state of Arizona. We don't need hazardous materials being transported through our recreational and national parks. Don't let the politicians get their way!
- Avoid impacting the natural landscape, wildlife populations and noise/visual pollution.
- Impacts to Sonoran Desert National Monument and Saguaro NP must be avoided. Use existing freeways as much as possible and only place new ones outside and far from the boundaries of national parks and monuments.
- Avra Valley
- All natural habitats
- Avoid any development here - leave the natural desert and its perfect life alone!!!
- 1.Sources of the existing river and its watershed and the demands on it from a greatly enlarged population.. 2.Saguaro National Park.
- Corridors for interrelated ecosystem functions (wildlife, water, vegetation, etc.) that will be interrupted by a new highway and the resulting extended development.
- National Forests, National Refuges Tribal lands, rivers, state land, lakes
- All of it.
- the whole area should stay free of any construction projects that fence off wildlife crossing.
- Saguaro National Park and Avra valley
- Sonoran desert, expand rte19, use 10. Then expand 60
- Water
- All of it.
- ALL OF IT!!!!!! THIS IS A BAD IDEA THAT IS FOR THE BENEFIT OF A FEW!!!!!!



- Avoid archaeological sites and sensitive habitat areas. Restrict corridor to areas already impacted by other developments.
- Wildlife migration routes
- I agree with the Sky Island Alliance and others that there is no need for a new freeway. We oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. Sky Island Alliance is in agreement with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." Under the right circumstances, we could support enhancing or expanding the existing I-10 and I-19 freeways, mainly through introducing high-capacity transit, to reduce congestion and accommodate future commuters, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.
- Saguaro NP West,
- No new corridor through Avra Valley
- PLEASE avoid Avra Valley and mountains E to Nogales, so many natural resources that are tourism draws like Saguaro NP & Desert Museum, dark skies to keep Kitt Peak functioning as a top observatory, Buenos Aires NWR with endangered pronghorn, Montezuma quail etc, the rare riparian area of Sycamore Canyon etc. I-11 yet another obstacle for healthy wildlife already stressed by area growth and preemption of water resources.
- Avoid all areas of intact native vegetation and wildlife habitat.
- Tucson Mts, Tumacacari, grassland east of Green Valley
- National Monuments and Parks. Please study impact on animal's routes to go between mountains and desert and not violate that.
- Every place outside of existing infrastructure
- Federal lands except military, native american reservations,
- Even though my residence is within 2 miles of I-10 and I would be impacted from a build-out of this existing corridor I strongly believe this is the best route for the I-11 corridor. Running the I-11 corridor through Avra Valley would adverse impacts on Saguaro National Park West, Ironwood National Monument as well as the rural aspect currently present in the area. Investing in rail infrastructure would be better for the environment and efficiency in transporting goods. Register my opposition to the I-11 corridor carving up Avra Valley.  
Thank you, Keith Kleber
- Wilderness, pristine desert landscape, plants, animals, archeological sites, wildlife corridors.
- Increased air pollution and disruption of natural areas and corridors for wildlife to move to different natural areas.
- Natural habitats, existing populations
- Wildlife habitat and corridors Watershed and water ways
- the whole western piece - stay within existing transportation corridors - no need for redundant N-S highway
- Use existing freeway system.
- There is no need for a new freeway south of Casa Grande.
- Wildlife corridors are becoming extremely scarce, and this proposed interstate project would negatively impact the ability for wildlife to move as they need. It would also adversely impact environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational uses.

- Saguaro National Park, Ironwood Forest National Monument, National Wildlife Refuge, Sonoran Desert National Monument, Tucson Mountain Park, Tohono O'odham Nation,
- Preserve wildlife corridors - a new road would be detrimental to migrating animals!!
- Wildlife corridors should not be ignored.
- archaeological sites along Rt85 to be preserved with access
- Interstate 11 should follow the SR 85 corridor to Interstate 8 in Gila Bend and terminate there. There is no need to extend I-11 to Casa Grande, Tucson, and Nogales. Those cities are served by I-8, I-10, and I-19. However, I-10 should be upgraded to four through lanes in both directions from Phoenix to Tucson and I-8 should be upgraded to three through lanes between Gila Bend and Casa Grande.
- STAY AWAY FROM TUBAC AND TUMACACORI. WE DO NOT WANT TO BE SANDWICHED BETWEEN TWO MAJOR ROADWAYS. PEOPLE COME TO THE COUNTRY TO LIVE IN THE COUNTRY AND THIS TYPE OF DEVELOPMENT IS THE EXACT THING WE DO NOT WANT WHICH WE PERCEIVE AS DESTROYING THE QUALITY OF OUR LIFE.
- National Parks, National Monuments, National Wildlife Refuge, Park and Rec Areas
- The Hassayampa and existing land holders
- Saguaro National Park, Ironwood Tree National Monument and Tucson Mountain Park
- Before you start HWY11 you need to improve HWY 10 going east and make it three lanes past Benson as they continue to build houses and businesses on the east side of Tucson. Also need to finish in places between Tucson and Phoenix three lanes. It's piece meal in places going up to Phoenix. It's a real hazard and dangerous if not completed.
- National Parks, Park & Recreation, National Forest, & Tribal lands
- Do not damage Wildlife habitat connectivity, Incorporate wildlife overpasses, underpasses at key crossing points.
- I would like to see the area south of I-10 near Phoenix avoided (Sonoran Desert monument) in terms of new roads, though 85 could be expanded. I-10 south of Phoenix, and I-19 south of Tucson already exist, and could potentially be expanded.
- The concept of double decking any freeway is not efficient and would have negative impacts on the region
- Robles junction highways 86 and 386
- In the Phoenix area, stay as far west as possible or avoid it entirely.
- TUBAC COMMUNITY AND GREEN VALLEY ARE NOT EVEN ON MAP-SANTA CRUZ RIVER IMPORTANT RIPARIAN AREA VERY CLOSE TO TUBAC WHERE THERE ARE MANY ARCHAEOLOGICAL SITES-RAILROAD IS ALREADY THERE-USE IT.
- Wickenburg, Hassaysmpa Preserve,
- If indeed the transport of nuclear waste is planned using a rail corridor to be along I-11 then I like the idea of the western boundaries of the study area connecting the Gila Bend, Palo Verde NPP and then along the western boundaries joining US93 between SR71 & SR89. IF the rail lines are to transport Tar Sands oil down from Alberta Canada, then I also request the most western route as well. If there is to be no rail carrying haz-mat freight, then I do feel a route that connects communities is ideal; such as Maricopa to Goodyear to Buckeye to Tonopah to Douglas Ranch/Whispering Ranch to Wickenburg and then to Las Vegas. But as I stated before this needs to be a QUALITY project not just an industrial waste-land sort of project. Passenger rail from Mexico, Tucson and Las Vegas could be quite interesting. A side note (off topic :) I think the commuter rail from Tucson to Phoenix would benefit from a western leg out to Buckeye as well. It would benefit air quality reduction by

encouraging commuters to ride the rail into the downtown areas. If in the future, the rail concept takes off, extend lines all the way into the LA basin to remove vehicles off of I-10 improving freight times and passenger safety from the many accidents that occur. Sorry, for the off topic comments, just wanted to share.

- Existing natural resources must be protected; we're "paving too much of paradise" to quote that song.... But our air is also increasingly polluted, and we have so little water, to endanger that is also an issue.
- Protect the Santa Cruz River which flows year round by Tubac, protect the Cottonwood Forest, people from around the world travel to Tubac to watch birds, putting in I-11 east of the railroad would disturb that.
- Vekol wash area. All of Hidden Valley, Haley hills
- dont go taking any private property
- Picture Rocks, Avra Valley
- Avoid anything anywhere in the vicinity of Saguaro Ntl Park
- Consider maximum use of passenger rail
- I am very much PRO new road. Including existing roads might result in too much congestion
- Tubac and Tumacacori are important historical sites and tourist areas and should be avoided.
- Anything that displaces humans, plants, and animals from their existing habitat. Double deck I-10, for God's sake! Everything there has been impacted already.
- The map is not detailed enough to show specific roads and neighborhoods or wildlife corridors. This area does go between mountain ranges which are natural corridors for wildlife and may have a huge impact on wildlife that would have trouble getting from one area to another. It would be best to include the freeway that is already in place and wildlife underpasses and overpasses to ensure continuity of these wildlife corridors.
- National parks and neighborhoods
- Avoid running the I 11 through Avra Valley
- Avoid Avra Valley entirely in respect for all it already offers that would be lost.
- Avoid all National Parks, Monuments, etc... Avoid splitting small communities with an Interstate.
- Residential neighborhood areas Following existing highways and freeways important
- Need to avoid White Tanks and Vulture Mountains. Also need to avoid the populated areas along Patton Rd (Wittman) from US 60 to the Hassayampa River and avoid Festival.
- Avra valley residences
- I think this is a fantastic opportunity for more growth in Southern Arizona!
- ALL! Take the new freeway and take it elsewhere. Further away from any farm lands, homes, trailer or any potential residential areas! We want peace an quite. If not we would live in town where there is a freeway already! We don't drive 35 minutes into the desert cause it's convenient! It's because it's the life syle we choose to live! No interstate 11!
- WOULD RATHER INVEST IN MASS TRANSIT AND EXISTING INFRASTRUCTURE THAN BUILD NEW HIGHWAYS. WOULD RATHER EDUCATE PEOPLE ON THE IMPORTANCE OF KEEPING LAND NATURAL, LESS DEVELOPING, & HUMAN POPULATION ISSUES
- See comments below.
- The study are seems small and should also include options such as: A tucson bypass route for interstate 10 that runs to the east of the Catalina mountains to help relive

congestion within the Tucson metro area. It should also consider a route to bypass Tucson on the west to aid in the Nogales-Wickenburg route also providing a Tucson bypass route.

- Please consider the wildlife corridors to the west of the White Tank Mountains.
- avoid using existing hwy 93 to Wickenburg-Kingman. leave that route as alternative local route. develop new I-II in barren desert btwn Tonopah, Aguila, Yucca to provide alternate route in addition to existing hwy 93. don't expand hwy 93.
- From Tucson south to the border
- Sonoran Desert Monument, San Xavier District, Tumacacori Natl Park, NWLR, any other National Park. Land or Refuge
- Archeological and spiritual lands on the Tohono O'odham Nation. Wildlife corridors in and around the Sierrita Mountains--deer, bobcats, mountain lions, hawks. National parks, national monuments, such as Tumacacori, Saguaro, Ironwood Forest.
- Easier for drug cartel and human smugglers
- Avra Valley
- The whole thing is a waste of money. Widen I-19 ! we don't need or want another Interstate in our back yards!
- Additional disturbance to sensitive desert environments
- Avoid currently congested areas. Shorten drive times. Increase overall highway safety & travel experiences.
- Shortest distance is best
- Double decking through Tucson must be avoided. Would only add to congestion and poor air quality. Would be prohibitively expensive.
- You must avoid the Wildlife Mitigation Corridor at Sandario and Mile Wide. The highway should not run along the Recharge Ponds there.
- Avoid residential and commercial impacts as much as possible.
- I-10 through downtown Tucson should be avoided. I have heard of a possible two tier double deck approach on I-10. That would be ugly and costly and only add to an already congested corridor.
- I-11 needs to go well west of the Vulture Mountains along the power line corridor.
- Please don't build bypass in Avra Valley
- The primary concern is to be in harmony with Mother Earth our planet is dying I am economic drivers do not take this into consideration. The country is having extreme heat, our water resources need to be protected we economic projects that do allow travel of rail carts or trucks that carry fossil fuels all over the nation there has been accidents not one but many that affect death in communities with toxic in the water, and air once a spill occurs there is no way to take back or to heal the land it permeates. I feel it is critical that impact studies are done by independent entities not those that have some money, profit to gain from the project we have use different values for economic development or climate effects will become worst and when the disaster hits none of what we think is important will matter Mother Earth is angry and she is coming. All that we do must be carefully done not fast with thinking of the consequences this is a practice that must become the norm for any project our world is in trouble because we act for rush results and not long term affects of our actions please consider this for your children, and grand children and generations to come.
- I have not researched the corridor in question but I do know that I-40 can not be maintained. Take the trip between Kingman and Winslow and you will see pot holes that will cause suspension damage if not avoided. Several attempts at patching have failed. Tax payer

dollars should be spent to fix and maintain the existing interstate system before starting another project that will not be maintained.

- National Wildlife Refuge and National Forest.
- Keep it away from Kitt Peak and the Santa Rita Mountains, which already suffer from too much light and air pollution.
- i like how the study is more pron to the low income areas of arizona. what no major highway though oro valey ??? can't have a \$600k+ house lose value ??
- consider existing freeway system and less impact on rural farm and natural recourses. Keep I-11 out of the valley lands. Stick close to existing major roadways.
- The area to the west of the Tucson Mountains.
- Avoid national parks and using eminent domain if possible. Find a way to relieve congestion on I-10.
- desert plants and animals
- Avra Valley area west of current I-10 that could be seen or heard from Saguaro National Park or the Arizona-Sonoran Desert Museum.
- I can not view southern half of map on iPad or phone
- The proposed route through Casa Grande shows the interstate replacing Florence Blvd., the main east-west road through the entire width of the city. It would effectively divide the community in half.
- it makes more sense to expand existing roads than add new ones especially when in Marana and Casa grand a new freeway could be as close a s 5 miles from I-10, there is no point in having two freeways in parallel only 5 miles apart.
- The route should be as direct as possible regardless of land use. High speed rail between Tucson, Phoenix and Las Vegas should be considered as well.
- Mitigate heavy traffic damage to Green Valley quality of life
- I think that the portion of the loop 303 corridor between I-10 and US-60 should be included in the study and should be seriously considered as a possible route for I-11. My reasons for this are: 1) Using loop 303 will utilize a portion of already existing infrastructure, which costs less. 2) It would benefit more people if routed along the 303; building it west of the white tanks only benefits those who are passing through, as practically nobody lives out by the Hassyampa River. I'm basically saying that I-11 should enter the Phoenix area from the south, along the proposed 303 alignment south of I-10, and follow 303 all the way up to US-60 and then continue on US-60's alignment to Wickenburg. This would maximize the amount of people who can benefit from it because then the west valley(I'm talking people living between the White Tank mountains and loop 101) would have an alternate route down to Tuscon/ southern Arizona. I think It's important that I-11 connects to the Phoenix metropolitan area on its course from Nogales to Las Vegas, but if it intersects I-10 at a point in the current study area(which seems to be just west of the White Tanks) IT WILL NOT make what I consider a connection to the metro area, and it would make I-11 virtually useless to valley residents.
- Please do not do this project. I realize that there is congestion on I-10 but this is no reason to spoil what makes Arizona special.
- You'll do a great job as usual. But we think the CAP National Recreation Trail and the crossing of I-10 at Tangerine Road is a very important factor to take into consideration.
- None
- Keep the corridor to the West of I-19 and I-10 to the greatest practicable extent avoid congested areas, habitat, scenic views, RR lines minimizing overall impact.



- nothing in particular
- I do not support the western alternative.
- avoid current neighborhoods, do not break up neighborhoods
- See my comment in 7 above.
- The proposed route to the left of I-10 is bad because it bisects two National Monument areas and will impact two Indian reservations.
- State & national parks & monuments, wilderness areas (i.e. Table Mountain Wilderness, Maricopa Mountains Wilderness)
- none
- Remove obstruction to Nogales General Plan E-W corridor at Freeport Dr. Get commercial trucks to I-19 at Target Range/Western Ave - That will be the ultimate solution despite any band aids we may do now.(should have designed the port to exit commercial traffic to the east - it would be half way there!)
- Average Valley / Desert Museum
- Avoid the Avra Valley
- Remove north-south through traffic from Saguaro NP.
- Saguaro National Park TMD and AZ Sonora Desert Museum must be avoided at all costs - any such freeway in proximity would degrade the experience at these 2 jewels of AZ tourism - can AZ afford to lose tourism dollars? Any freeway in Avra Valley MUST be avoided.
- The West Valley absolutely needs a faster, more efficient way to connect to the East valley where it is sadly lacking now and the residential population has exploded out here. However, we must also be mindful to the environmental impact to these neighborhoods and our natural resources out here as well.
- All of it. The land this proposed highway will traverse is worth ten times the cost of the highway to leave the land as is.
- Hassayampa River and Hassayampa Nature Conservancy Preserve
- In Avra Valley there is such limited area left that a corridor there will impact Saguaro NP, Ironwood Forest NM, Tucson Mtn.Park (Arizona Sonora Dessert Museum), Tohono Oodham tribal farms and Ryan Airfield. .
- Avoid all natural habitat, historic sites and buildings, residential areas, surface and ground water impacts
- Do not combine with I-10 between Phoenix and Tucson. Need an alternative highway route for this corridor.
- My home
- Sensitive environment identified during the process.
- The entire Tohono O'odham Nation must be consulted with, with a series of scoping meetings in communities throughout TON, as well as presentations to the TON council. These meetings should be publicized on KOHN radio as well as in the TON tribal newspaper.
- The corridor study area contains a large amount of state and federal public land that is critical to the habitat of the plants and animals that this area is world renowned for. In addition, there are likely a vast number of archaeological sites that will likely be disturbed by the construction of a new highway on these lands. The construction of new highway will likely destroy priceless cultural resources that are part of our shared cultural heritage. Additionally, from a pragmatic standpoint, the mandated mitigation of these sites will cost taxpayers additional money. Thus, I support the improvement of the existing Interstate 10

corridor, which will minimize the impacts to our public lands, and natural and cultural resources.

- Minimize impact on National Parks and National Monuments.
- The I-11 proposal that runs west of the city down Sandario should not be considered. This is pristine desert with abundant wildlife and cacti. Destroy that and you will destroy tourism to the parks nearby. The noise pollution and air quality will also destroy the environment. When I bought my land many years ago, I had to pay an environmental impact tax of 4000.00. Doesn't anyone care about the environment anymore? We have bighorn sheep identified in the Tucson Mountains that were not part of the placed sheep on Pusch Ridge. We would destroy their habitat. We have pygmy owls in this area and would also destroy their habitat. Being out here in the desert with the wildlife and views is why I love it here. This corridor would destroy the beauty of this area forever.
- I like all the possible routes.
- Consider making SR-85 as part of the I-11 freeway connecting it with I-8. I-8 is really underutilized and could support much more traffic as well as raising the speed limit.
- Avoid placing a barrio between Saguaro National Park West Unit and the mountain ranges to the west, such as Ironwood National Monument.
- National Monument areas. Make as little impact as possible.
- Hopefully, there will never be an I-11.
- National parks and monuments, state parks and recreation areas, state and national wildlife areas
- avoid natural beauty destruction
- Santa Cruz river and its ground water recharge zones.
- San Pedro River, National Forest Lands, National Parks, Wildlife Refuges
- The national park
- I'm concerned that this proposed area goes through the Coronado National Forest, Saguaro National Park West and the Sonoran Desert. I think it's a mistake the have a corridor run through any national monuments or national forests.
- Southern AZ: border to Ironwood NM, especially tribal lands, Tumacacori and San Xavier historical sites, and areas of importance to native flora and fauna.
- All public lands must be avoided. Particularly important is the Sonoran Desert National Monument, Ironwood Forest National Monument, Saguaro National Park, Coronado National Forest, and Tumacacori, and the connectivity for wildlife in between them.
- Avoiding mt lemmin in tucson, route thru it
- Keep the freeway away from the rural areas around the city of Maricopa. We do not want any of the mountain areas or our neighborhood affected by this freeway. Keep it out of the Hidden Valley and Thunderbird Farms neighborhood.
- Avoid the path that goes through Stanfield, S of Maricopa and creates a new path E of Hwy 85. Follow I-8 and Hwy 85 as part of the path, thereby using existing structures.
- None. Lets get this done.
- In terms of land use, evaluate the amount of SPRAWL/cheap new housing developments that will pop up in the far far far west reaches of the Phoenix Metro area.
- Construction near the historic Gillespie bride and adjoining biologically significant riparian wetlands should be avoided. The new bride across the Gila River should be built further south such as at Patterson Road, the roadway should be built over Enterprise Road to the intersection of old highway 80 west of any riparian habitat. South of Lewis prison, an

interchange and frontage road exist which could foster the transition of the I-11 route from the existing highway 85 corridor where it would veer to the west, crossing old highway 80. I am a resident in the corridor study area southwest of Buckeye. I am in Colorado this summer, but would like to attend the June 15 meeting in Buckeye by telephone if at all possible. Please contact me. I will be emailing in further detailed comments. Thank you.

- Saguaro National park Undeveloped wildlife areas are in jeopardy
- N/A
- To try to build a freeway connecting southern Arizona to the Phoenix area, and, from there, a freeway to Las Vegas that does not disturb our great national parks or monuments including the Sonoran Desert National Monument. A route north of Case Grande that goes east of the Estrella Mountains would help alleviate any disturbance to the national monument.
- Avoid Saguaro NP, Ironwood forest, protected deserts. Use current corridor for best economic, environmental impact.
- Saguaro National Park and Tucson Water's settlement basins in Avra Valley.
- Apart from areas already prohibiting development, I think everything should be considered. Sometimes we need to make sacrifices for the long-term greater good.
- Do not route through Avra Valley. Double-decking six miles of I-10, according to then-ADOT State Engineer Jennifer Toth in 2008, would do everything planners want for the next 30 years at one-third the cost. That would save taxpayers nearly \$2 billion. And will preserve existing desert habitat for plants, animals, and residents.
- The whole idea has no redeeming qualities. It should be stopped.
- Increasing traffic and related noise in Green Valley
- none
- The entire Avra Valley section absolutely should NOT be built. This freeway is not needed, now or in the future. We have I-10 and I am totally opposed to spending a single dime on this project. Freight should be hauled by rail. Subsidizing the trucking industry with this highway is a waste of our tax dollars.
- The portion of Avra Valley between West unit of Saguaro National Park, Tucson Mtn. Park and Ironwood Forest National Monument
- residential areas in Wickenburg
- We must protect the established national monuments.
- The Avra Valley is a large area of several national, state and local natural area's. Some of these are open to people to walk, bike, horse riding and recreational vehicles. Putting a large; very expensive barrier (I-11) in this area is stupid. Build on the right of way's you have and leave the rest to us.
- water resources.
- I think it is important to consider a roadway that goes North and South on the west side of White Mountain Regional Park so that Phoenix Metro can grow and spur growth
- Stay away from the already congested Oro Valley area and swing west of Tucson and the desert museum. Stay west of the I-10 corridor all the way.
- Keep corridor away from populated areas. Allow for access to corridor from I19.
- Recommend expand/utilize I-19,10,8. Bypass Tucson west side. Link I-8 to AZ-85 convert to I-11. Link I-10 to US-93 along Hassayampa river new I-11.
- Just widen I-10 from Phoenix south. 3 lanes minimum! Concrete barrier in the median! Stop the backups caused by crossover wrecks already.

- The economic vitality of medium sized communities should be strongly considered. The freeway will bring much commerce to these communities and provide regional connections.
- The impact of economic successes or failures of the current business that I-11 could potentially take away from.
- This survey covers the main areas, but it is critical to build smart and right to include several concepts in same "build." RAIL; Canal water for Tucson; connecting communities
- All of Az resources are important. This corridor is just another way to displace poor people and make Huckleberry look like a hero.
- I drive around the no-man's land east of I-19 in the Tubac, Rio Rico and Amado areas every day. If you build a huge road and expand the railroad where the current railroad tracks are now, you won't disturb or bother anything worth saving.
- Building new interstate travel lanes through sensitive areas or areas of historic, natural or environmental importance needs to be avoided. Stay away from the national monument, national park, national forest and national historic places. These rare and treasured locations should not be blighted when there are existing roadways in I10 and I17 that can be expanded upon.
- Stay outside cities and towns.
- Sonoran Desert National Monument and Ironwood National Monument are valuable BECAUSE they are undamaged desert sites. A road will significantly negatively impact them both from an ecological perspective AND for human use. We go to National Monuments to get away from cities and roads, not to observe new ones.
- I-11 should be routed to the West of the Tucson Mountains thereby creating new economic development opportunities while providing alternate routes for those living and working on the west side!
- Proximity to current Interstates. Redundancy.
- You are talking about destroying history by destroying the beauty and peacefulness of the Saguaro National Park and Ironwood National Forest, the Coronado Forests, the sanctuaries of the Reservations. I mean come on. We are fighting to preserve the rawness and beauty of what exists. You want to destroy history you can't even see, I bet you don't even know where all the Petroglyphs are located along this proposed corridor. Or how about any of the Indian Dwellings? You don't see them, they might now even be documented, but some of us know where they are and your corridor will destroy them! Not only this, it will enable even more smuggling of drugs and illegal aliens into our country. These communities near the border are greatly struggling to fight the battle of drugs and border crossers. You, on the other hand, are opening up yet another route that will make it easier for them. Traveling to and from these areas along with the time constraints to get to town or across the state are not our biggest concerns. We do not live out here for the convenience to the "store/city" factor, we live out here for the raw beauty of nature and history. YOU want to put in an interstate that will be the biggest eyesore in our history. Stop destroying our land, let us leave a legacy of pure raw beauty for our children and their children!
- Don't tear through existing neighborhoods in cities. Don't create lots of new freeway outside existing corridors that would urge developers to build sprawling new developments (i.e. west of White Tanks), which would only create more traffic rather than alleviate it.
- Tucson Water facilities, recharge ponds, piping and easements.
- Ironwood National Forest, saguaros, archaeological sites
- An Avra valley route should be avoided. I foresee a huge detrimental impact on the Saguaro Nat'l Monument and Tucson Mt. Park. A highway on the west side of the Tucson Mts. would have a major impact on pristine desert as well as contributing to the slaughter of a

tremendous amount of wildlife. I would propose a route that would follow I -10. Either adjacent to or stacked on the existing freeway. It's my understanding stacking would be less expensive as well, making this a more viable option.

- Please choose options that require the least air emissions, the least water damage, and the least interruption to lives of people and habitat. We have to move forward damaging the earth the least we can.
- The entire Avra Valley and any area west of 19 or 10. Widen the existing smog zone ,, put to better use the area that is already screwed up. WHY ruin a beautiful natural valley to help another country ??
- I strongly oppose the proposed route of I-11 through the Avra Valley west of Tucson for all the environmental factors listed in section 8-- noise, traffic, pollution, interruption of animal transit corridors, destruction of natural beauty. And for economic reasons as well: its effect on tourism at Saguaro West National Park, the Desert Museum, Ironwood National Monument etc. It seems to me that I-10 could be widened or double-decked or that existing rail lines could be upgraded without destroying one of the few relatively unspoiled areas remaining in the Tucson area. I strongly oppose this route and believe there are other alternatives for transport south of Phoenix that would be far more economically and environmentally feasible.
- I DO NOT WANT OR NEED A FREEWAY IN THIS CORRIDOR! Your survey is leading and i will not allow you to put words in my mouth.
- PUBLIC PARKS AND WILDERNESS
- The areas that I know that will cross Avra valley and the reservation. Destroying too much land and ruining the views from State and National Parks as well as Desert Museum and Gates Pass. Not to mention wildlife and all the homes
- National monuments
- I am concerned about how the plants and trees will be handled. It is a major item to consider
- DO NOT BUILD MORE ROADS. How will we pay for the maintenance? We are unable to pay for the maintenance and repair of our existing roads and bridges. The future is in RAIL/TRAINS, not roads.
- go around the preserves, national parks, monuments, etc. If you cross current or planned trails (hiking, equestrian, etc) be sure not to cut them off. Work closely with AZGFD to accommodate wildlife corridors. Prepare for smart trucks / cars.
- avoid national monuments, natural desert open space, bisecting/dividing communities
- this link doesn't work
- San Xavier, Tucson mountain park, Kitt Peak observatory and saguaro NP should be considered. Hopefully impact to these places can be minimal.
- Air quality, efficient modal cooperation, desert vistas and protection of desert and human quality of life.
- Stay away from Highway 60, it's busy enough already, and is a well managed habitat, i.e. the Hassayampa Preserve, the relatively low density of the population per square mile.
- Should instead improve the existing freeways between Nogales and Phoenix.
- All local, regional and federally preserved and protected lands. This includes any riparian watersheds and wildlife travel routes.
- The entire area.
- none
- Must avoid the proposed Avra Valley corridor.

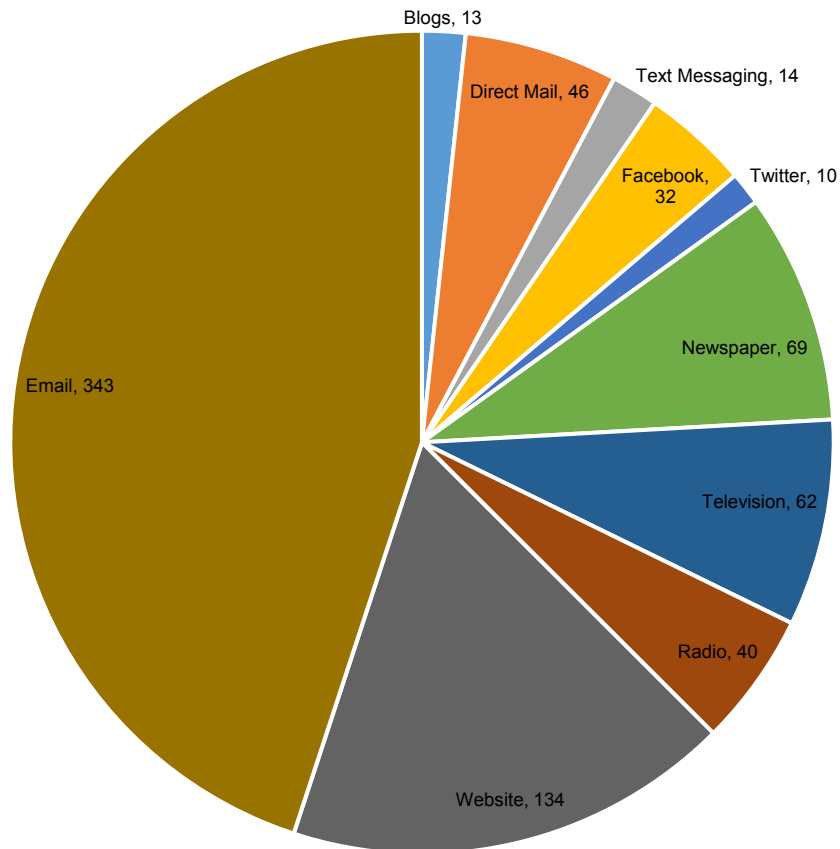


- Environmental concerns for new highway between Ajo Road along Sandario to north of Avra Valley and near Ironwood Forest.
- From Casa Grande south, utilize I-10 and don't tear up more desert than necessary.
- Avoid the following, National Monuments, National Forests, National Wildlife Refuge, Tribal lands.
- Consider upgrading existing corridors instead of having a complete new corridor.
- Stick to existing roadways.
- None that I can think of
- Any national parks or monuments, large population of wildlife and plants.
- ALL of it is important! it should all be left alone!
- Rural lifestyle in rural western pinal county, (thunderbird farms, Papago buttes, hidden valley, etc) Indian reservations, Estrella wilderness, northern Maricopa mountains, southern Maricopa wilderness, Sonoran monument areas, blm lands along Maricopa/Pinal county line, table top wilderness. Let's not forget the Goldwater range!
- Avoid more development that will increaset water useage
- Why make a separate freeway in the same area, when you can just expand the current one??
- existing forest, national park, wildlife area or BLM land.
- Avoid recreation areas and smuggling routes. Sign as required. Provide roadside call boxes in remote southerly areas for safety.
- Probably a more realistic objective, capable of being completed in this Century, would be to finish the expansion plans for I-10 from Tucson to the I-8 split and then on I-10 north through Phoenix and west to the California border.
- National parks and monuments.
- The entire study area should be avoided. Estimates of future traffic loads on I-10 are deeply flawed.
- All archaeological sites within the study area. These are non-renewable resources that once destroyed can never be replaced.
- Very concerned about the path coming through Avra Valley and possible disruption to Saguaro National Park West and the Wildlife Mitigation Corridor to the south of the park. This is a national park, a tourism treasure and should be preserved and enhanced.
- Disrupting water resources must be avoided - we are in the desert.
- Saguaro National Park must be avoided Endemic Species and their habitats must be considered
- It is important to make a new freeway around Tucson rather than building upon I-10 in Tucson
- All undeveloped areas, especially those important to wildlife.
- I think that a rail line should be considered before we build another freeway. Rail would be a much better alternative.
- Urban and suburban areas
- Important and sensitive environment and wildlife habitats, Corridors implemented for animals to navigate the division of highway more safely.
- Why do you need to build a new road outside of Tucson? Existing I-10 is now four lanes up to Marana. Then it goes from three to four lanes. In Penal county I-10 is being expanded to three lanes. There is no need for another express way.

- Protect any and all tribal lands and designated public land - parks, forests, monuments, and BLM. Southern Arizona is overdeveloped as it is, and a new interstate highway will be way too destructive of the desert environment and public land.
- all.
- Saguaro National Park West
- Align freeway to avoid Wikeup and Wickenburg.
- Parks, preserves, water planning facilities, historic sites such as San Javier de Bac, Tubac and nearby missions
- Saguaro National Park, Tumacacori National Historical Park, N.W.R., don't want to split the Sonoran Desert National Monument,
- I cannot believe that ADOT is honestly proposing such a project, going through and ruining national parks and national monuments! Please STOP ADOT. There is not guarantee that commerce will improve, add jobs. It is just a scam to make wealthy developers wealthier and by eminent domain remove old homesteaders. I am against the whole project. Joan of Picture Rocks
- Needs to take into account new S-202. Really should try and manage truck/freight traffic away from populated areas for passing by
- avoid anywhere along the Catalina Mountain range.
- Provides an interchange with interstate 10
- Tucson Mitigation Corridor, Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, and the Tohono O'odham Nation

## Question 6

How do you prefer to receive information?



### Other (please specify):

*[responses not edited for spelling, grammar, or capitalization]*

- Through conservation organizations
- public meetings when appropriate
- If it's accurate information.
- DO NOT USE THE CORRUPT MEDIA AND THE CRIMINAL RAUL GRAVILLIA, HE IS AN ILLEGAL ANYWAY
- NPR, public meetings
- Family and Friends
- engraved solid gold tablets
- meetings
- BOOKS, ARTICLES, SOME TV/RADIO/INTERNET
- I'll follow on my own - thank you
- currior pigeon

- Neighborhood group meetings, talking to ALL of my neighbors,, supporting local companies, not Foreign Companies,, Support America FIRST
- HAM radio
- don't bother
- Local townhall meetings in Three Points, Tucson Estates, Sandario road communities
- post big sign in areas to be affected

**Additional Comments (open-ended response):**

*[responses not edited for spelling, grammar, or capitalization]*

- Many of us living in Tucson would appreciate seeing rapid transit rail connecting Tucson with Phoenix. This would most certainly relieve congestion on the I-10. New alternatives are worth more to taxpayer investment rather than squandering our tax dollars on the current and failing methods of travel & transport. See southern California as a reference for failure.
- ADOT's planning and implementation resources should be focused on an improved commuter rail line between Tucson and Phoenix and not on an additional Interstate route.
- Please stick to existing routes as much as possible
- This project is not good for Arizona as it will degrade the ecosystem and just result in another dirty highway that ADOT will have no funds to maintain, just as they are not maintaining I 10, 17, and 40. These highways result in degrading the quality of life for humans by increasing the traffic noise and pollution, while killing animals resident in the corridor. This project reflects a lack of innovation in ADOT and USDOT to move into the 21st century and beyond and reflect the US Government's lack of wanting to invest in the existing infrastructure.
- No route east of I-10 should be considered! Need for the southern section could be met by expanding existing I-10 (to Casa Grande). Cost benefit of southern section should be weighed against Sonoita cutoff (Nogales to I-10 east of Tucson).
- Arizona is one of the most spectacular states for natural beauty and resources and wild places. We just keep carving it up in the name of progress and improved movement of people and products through the state to somewhere else. We should think very carefully before we further damage what makes Arizona so beautiful and important to us, wildlife, and to tourism..
- Please consider that the existing freeways have already disturbed the plants, animals, and people along the route. Extending the corridor will be less costly and have less impact on the wildlife. Please include rail and that would cut down on congestion a lot! A trip from Tucson to Vegas would be fun by rail!
- I question whether or not this route is really needed. There is an existing interstate between Tucson and Phoenix, and rail lines and utilities as well. Travel projections in the past have frequently overestimated what the real need would be. With more emphasis on rail, there will be less need for roads.
- This project has no local benefit, and will substantially harm the environmental and cultural resources of southern Arizona. It should not be built as a separate entity in southern Arizona. If additional capacity is warranted on I-19 and I-10, then expand those freeways according to existing traffic growth patterns, not theoretical projections that are based on broad assumptions. This would be an incredible waste of public money.
- We can't support the roads we already have in place. It is a terrible idea to add this corridor with that in mind.
- I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. There is no need for another freeway. As a former resident of Northern California, I can attest to the fact that more freeways do not relieve traffic congestion or speed vehicular traffic or commerce. Freeways just create more noise, more pollution, more environmental damage and more traffic congestion. Instead, you should enhance or expand the I-10 and I-19 freeways, which would help reduce congestion and allow for future traffic



increases. It's more important to me to minimize environmental impacts and maintain the quality of life found in southern Arizona. Furthermore, more rail should be used to move goods and people. I commuted via BART for years into downtown SF. It was so much better than driving every day. Thank you for taking the time to consider my comments.

- This survey is obviously slanted toward building I-11 giving selections that mostly help support its goals. 7/8/16 Reasons I-11 through Avra Valley should not happen I-19 and I-10 are already being widened to accommodate more traffic. Monies already being spent on a larger footprint through this region as well as upgrading those roads. And I-19, I-10 is a more direct route than the I-11 would be. Bypassing Tucson's businesses will cause demise of businesses and loss of local jobs. And already there are businesses that are along the I-19, I-10 that will be affected by the loss of traffic along their routes if this I-11 is built. The ribbons of uncontrollable lights from I-11 traffic through Avra Valley would have impact on the world class Kitt Peak Observatory and would affect the dollars it brings into the community. It would have huge impacts on thousands of families that have chosen a rural lifestyle. It would have negative impact on environmental resources including Saguaro National Monument, Ironwood, Desert Museum, Picacho Peak, numbers of open space bought by Pima County which I-11 would pass by or through, and the community of Marana. I-11 is not for nor will be for the benefit of our local community. It will only cause disruption of many lives, benefit a select few who make the money off the deal, cause massive changes in the direction Pima County and its citizens have been going in regards to environmental issues. If the rumors are correct that I-11 is mostly for the benefit of Canada and Mexico, and for the reasons have already stated this study for a route I-11 for 3 more years is a waste of taxpayers' money. This study should be shut down. The money saved from both stopping the study and the potential monies to be used to build a I-11 should be used instead for helping to repair the crumbling current highways infrastructure. Beryl, activist Tucson
- Please cease and desist this wasteful and delusional proposition that you refer to as I-11.
- As a property owner in the Avra Valley of Pima County from 1995 to 2010 and resident from 1998 to 2010 I have twice fought efforts to violate the integrity of the Tucson Mitigation Corridor -- once by the Public Service Company of New Mexico in 2000 and following years and then by the Arizona State Transportation Board in its 2007 proposal for an Interstate 10 bypass through the Avra Valley. The Interstate 111 proposal represents more of the same poor planning. It is utterly foolish to propose a new highway through land that will destroy wildlife connectivity through the Ava Valley, severely degrade the enjoyment (and the economic value to the Tucson area) of Saguaro National Park and Tucson Mountain Park, and disrupt the homes and lives of perhaps thousands of people living in the valley who many times are just marginally able to keep themselves afloat financially. Expand and improve Interstates 8 and 10, and no new highway will be needed. And consider the possibility that the glowing economic aspirations of Tucson leaders are really pie in the sky - Tucson is not going to become a significant transshipment point. It is more likely to be bypassed as shipping from Asia bypasses the West Coast and heads directly for Gulf and Atlantic ports, now that the expanded Panama Canal can take much larger cargo ships.
- I feel this project could potentially grow the economic development of Tucson. Giving families opportunities, even visitors a chance to see Northern Arizona and all its history.
- PLEASE RECONSIDER YOUR STUDY AREA AND DO NOT DISRUPT THE DESERT!!!
- The EIS should fully outline impacts to Pima County's Conservation Lands System. All possible alignments of Interstate 11 would impact lands identified in the Sonoran Desert

Conservation Plan's Conservation Lands System. We do not want another transportation project that negatively impacts our biodiversity and open space in Southern Arizona.

- Please regard the Avra Valley area as one of the last great environmental places that must not be destroyed. Think outside of the box for our future.
- I do not believe the environmental impacts of I-11 can be mitigated to a sufficient degree to justify its existence. I would rather you work on improving I-10 which is already a terribly ugly drive. You can't make that highway worse, but you WILL DESTROY beautiful natural area and wildlife corridors if you put in yet another highway.
- I can only reiterate what I pleaded in 9, above: the region west of the Tucson, with Tucson Mountain Park, Saguaro Monument West, and the Desert Museum area is the last -- relatively -- unspoiled part of Tucson. Please, do not pave it.
- Double deck I-10 if this is forced upon us. One third the cost, the appropriate place for it and avoiding the destruction of Avra Valley. Do not think for one second that the citizens of Pima County do not know that this is the Huckleberry Highway and the only people benefitting will be the fat cats of Tucson who have pulled Chuck's strings for decades. Shame on all of you!
- This is not a wise use of our planning dollars. Let's work to focus on more efficient and unifying uses of the corridors that are in existence. Current land-use in this corridor provides essential habitat and water conservation zones that climate change projections (and reality) show we will desperately need. Thanks for listening. -Ron
- Improve existing transportation facilities only for all modes. Develop a statewide active transportation plan and incorporate bike/ped travel options. Update decades-old models. Use innovative techniques and new ways of thinking. Life does not revolve around vehicle travel in the same way it used to - its time to modernize your thinking.
- Impacts from noise and light pollution The EIS should fully consider the impacts of noise and light pollution from any proposed alignments on nearby wildlife and wildlife habitat. Any alignments within the study area WILL have serious negative impacts on the observatories at Kitt Peak from light pollution, both from vehicle headlights and from future commercial and residential development. Broader Impacts Finally, the EIS should fully consider the broader impacts of all alternative alignments. Any Interstate 11 alignments through Avra Valley would dramatically increase accessibility and thus encourage commercial and residential development. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs, and force major changes to existing land-use and zoning designations. Existing land use plans have identified the areas most appropriate for growth and any new transportation corridors should be appropriately sited within those existing growth areas. In consideration of the proposed Interstate 11 between Nogales and Wickenburg, we argue that improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best minimize environmental impacts. I question the need for a new interstate between Nogales and Wickenburg at all.
- I sincerely don't support the I-11 corridor as mapped out, which runs close to Saguaro National Park and other natural area in Avra Valley. From everything I've read it just doesn't seem necessary.
- We will most certainly be interested in attending any meetings or events after our move in 2017....

- I'm concerned about environmental impact of wildlife and diminishing water resources.
- Instead of double decking I-10 at a lower cost you want to spend more money and screw the environment, water, The National Park and night sky. Are you kidding me? I guess not.
- This is another money pit sham on the taxpayers, Leave the desert alone and don't isolate biodiversity with a trump wall in the form of a freeway.
- First I have heard of I-11, it needs more publicity
- There are more important things than having a faster drive or encouraging more people to drive. If we are going to spend money, redo Tucson's infrastructure so the water doesn't evaporate on it's way out of town, but is directed to the aquifer.
- I think the I-11 corridor should not run through our monument! Saguaro are a protected cactus that are only in the Sonoran desert. Please don't destroy our views and air quality by building a huge, expensive freeway through our national monument. There are several better, cheaper alternatives that will not affect our families, farms & homes. We choose to live where we do for the peace & quiet!
- CONVERT THE KINGMAN-BOULDER HIGHWAY TO AN INTERSTATE AND SAVE MUCHO DINERO USING I-19/I-10/I-17/I-40 AND KINGMAN-BOULDER
- Keep development centered where already occurring. VERY concerned about opening up a new area to higher density development by building new highway area
- I do not perceive the need for an additional interstate so near to I-10. I have driven to many parts of the state (and up to Las Vegas), and I never experience significant congestion. The one place where congestion is bad is on the highways around Phoenix, but this is due to commuters in the Phoenix area and could be better addressed with improved public transportation within that metropolitan area. A primary draw for me to live in southern Arizona is the proximity to natural areas for recreation, including many areas in or near the proposed I-11 corridor. The construction of an additional interstate will significantly reduce my enjoyment of this area, and I will be less likely to continue residing in and contributing to this region. I will also be less enthusiastic about promoting this region to my friends from other parts of the country.
- Existing routes are satisfactory for economic progress. New roads lead to accelerated destruction of nature. Too much has been lost already. For the sake of our grandchildren, I-11 is NOT NEEDED. There MUST BE NO I-11.
- As wildlife habitat continues to suffer from development and incursions we need to make it a higher priority to protect these resources.
- The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West. Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well. I'm also concerned about impacts to federally and locally protected open space, including Ironwood Forest National Monument, Saguaro National Park, the Bureau of Reclamation's Central Arizona Project mitigation corridor, City of Tucson mitigation lands for their Avra Valley Habitat Conservation Plan, and Pima County mitigation lands for their Multi-Species Habitat Conservation Plan. There is no need for a new freeway. I oppose the proposed I-11 highway bypass route

through the Avra Valley, west of the Tucson Mountains. I'm in agreement with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." Under the right circumstances, I could support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.

- July 7, 2016 As a resident of Tucson, I am strongly opposed to the Interstate 11 corridor from Nogales to Wickenburg as currently envisioned. I am very concerned about preservation and protection of our beautiful Sonoran Desert, protecting adequate wildlife linkages in Tucson and Pima County, and the urgent need for a sensible and appropriate water policy in our desert region. I am also concerned about the economic viability of our region. Construction of a new highway in the area of the proposed I 11 corridor which currently has no transportation or telecommunications infrastructure would cut off essential wildlife linkages, destroy the desert environment and ecosystem, and require huge amounts of fossil fuel and water to build and maintain. It would also harm the economic activities of numerous businesses along Interstate 10. Finally, the construction, maintenance and use of this new highway would add to dust and noise pollution in sensitive wildlife and national and city park areas adjacent to the new highway. I am not certain that we actually need a new highway at all. Therefore, I urge you to either choose a "no build" option, or plan for an improvement in the current Interstate 10/Interstate 19 using rail, non-fossil fuel energy sources, employing state of the art methods for dust and noise abatement and hiring local labor. Thank you. Ivy Schwartz, MD, MPH
- i would prefer you not build this additional freeway. It is sure to affect wildlife and humans.
- What are the expected timescales for the project after the planning, from the start of construction to its end? Would it start at the north end and would it be conducted in stages?
- I really think using and upgrading/expanding the existing transportation corridors, where possible, would save a lot of money and achieve a similar purpose. It would also surely mitigate environmental impacts and save money in that regard as well.
- We must protect our natural resources, our habitat, we need to learn to reuse ,repair, rebuild what we have , and stop this let's build all new . Use I-19 to I-10.
- Extending the Interstate is a bad idea all the way around' a disaster for the environment.
- I oppose the construction of the proposed I-11 highway bypass route through the Avra Valley west of the Tucson Mountains. This would cut through some of the pristine Sonora Desert and through some other protected areas of the desert. If it is actually needed, expand Interstate 10. Please don't destroy more of the Desert and the critical habitat for the desert wildlife. Interstate 10 can be expanded without destroying the desert.
- To make I-11 a double decker over I-10 is the best option. It eliminates environmental destruction of irreplaceable cactus, eliminates light pollution that would effect Kitt Peak Observatory, and preserves the monuments and parks that are the primary tourist attractions. It also saves an incredible amount of money.
- We do not need to bisect our beautiful, unique and fragile desert environment with another highway. Improve or add to the existing highways if you must.

- I, and many other people, visit the Tucson area regularly because of its natural beauty and wildlife. You do not need to encourage more sprawl. How about a nice passenger link between Tucson and Phoenix instead of another road? Thanks.
- There is no need for a new freeway. I agree with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated."
- The corridor best serves the people if it avoids stressing natural resources in Saguaro National Park and Tucson Mountain Park. A route through existing urban areas provides a greater benefit in accessing residential, business and urban areas, as well as relieving existing traffic control issues.
- No new corridor in southern Arizona.
- There is no need for a new freeway. I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. I am in agreement with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated."
- I UNDERSTAND THE NEED FOR TRANSPORTATION, BUT I THINK THAT ARIZONA IS GOING IN THE WRONG DIRECTION BY IMPOSING NEW FREEWAYS ON EXISTING COMMUNITIES. IT WILL DESTROY ARIZONA'S QUALITY OF LIFE.
- Since I live in the Nogales- Tucson area I am most concerned about the impact here. It is unclear to me if the present 1-19 will remain the same or be widened and expanded. Also, the residents of this small community do not want to see a permanent border check point established as part of this plan! If anything, a checkpoint should be eliminated or moved further south.
- Build West valley east, west freeways first. And 202 needs to go out to at least Dysart Rd.
- 1. The alternatives running west of Wickenburg essentially fail to serve the simple purpose of connecting Phoenix and Las Vegas with a viable transportation route as the 40 to 60 mile detour versus existing routes will prove unworkable. 2. To the extent that I-11 routing west of Wickenburg becomes an enabling factor for the development of the "proposed 5 million SF Forepaugh Industrial Rail Park" in a location with no labor force and no existing point sources of air pollution, and no effective east-west transportation access, it will destroy not only this community but a major portion of western Arizona. Wickenburg will be far better off if it is not built.
- I am opposed to this project. I do not feel that we need another road in the corridor.
- I-11 is simply an unnecessary large expenditure of our tax dollars. I have driven between Tucson and Las Vegas many times and have not had difficulty with the existing routes, taking either I-10 and US-60 or the Phoenix bypass of I-10, I-8, AZ-85, Loop 303, and US 60. Perhaps a new route would make this trip marginally shorter, but it is not worth the billions of dollars it will cost in a time when those resources are desperately needed elsewhere. We are not spending enough on maintenance of the highways we already have. This is no time to be constructing another highway that we will not have money to maintain. It would be better to dedicate our highway money to maintaining our existing system.

- I-19 & I-10 are already in place. Improve them, use them. Options to the west and to the east of Tucson will wreck wildlife corridors and pristine lands.
- It would make sense to bring in the I-11 south and west of Wickenburg and tie in at SR71 and 93. This provides access to roads leading to Prescott, Vegas, and other points north using existing roadways rather than creating new ones (decreasing costs). Using the 60/93 route through Wickenburg increases, not decreases congestion and noise as well as negatively affecting downtown businesses. The route also increases the number of buildings and homes to be removed - an increase in costs.
- consider alternatives - e.g. - congestion pricing on interstate, flexible congestion control - signalized restricted lane, truck only lanes, high capacity transit lanes, HOV lanes, enhance high capacity transit parallel to I-10 / I-19 - light rail, commuter rail, bus rapid transit - use technology to improve flow - autonomous truck driving - double track and improve existing rail. improve regional transit to decrease local traffic on interstate, toll road - many alternatives already exist to control flow and traffic capacity without needing wasteful and destructive new freeway.
- We do not need this expansion.
- Can't express how disappointing this proposal is. Disgusting!
- I think it is important to maintain the peacefulness of nature such as the Estrella regional mountain park.
- The freeway between Tucson and PHX. needs expanded...there is plenty of space adjacent to the existing highway. A fast tram rail would be great where people could transport their vehicles ferry style. Don't care about getting to Vegas!!!!
- Be safe, protect yourself from the heat and drink lots of water. Please protect our water streams and ponds and leave something for our children and theirs. Since have rail tracks already in place, maybe bring in a locomotive train to do a route from the south to Vegas. Like the Williams trains to the Grand Canyon (what a success story that is) God bless.
- Leave the Desert alone, there are enough roads already.
- I am opposed to any new roads or freeways that impact or are near the Sonoran Desert National Monument and Saguaro NP.
- There is no need for a new freeway. I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. I agree with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." I do support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona. Thank you, David Crowley
- STOP this greedy development - the desert was not meant to be inhabited by humans! I'm moving out of here to preserve what is left of the natural desert and its rightful inhabitants - flora, fauna, geology, water, air, sun, heat.
- I understand that traffic is only projected to get heavier across the potential I-11 corridor, and that Phoenix will become even slower to pass through using I-10. However, as an Arizona resident, I would rather experience more traffic, or find alternative transportation



methods (more rail, shuttles, etc.) that will unclog the existing roads rather than encourage more individual road travel by building a new road. In addition, the development resulting from a new highway (exits/entrances, gas stations, and potentially new areas of residence) are an unnecessary waste of our soils, vegetation, opportunity for recreational solitude, uninterrupted desert vistas, and water that would be used through highway development.

- We don't need more roads, asphalt, concrete, and chemicals. These roads through the desert barely serve us anyway-- most of the time there is little traffic on them. We have plenty already.
- This project seems incredibly unnecessary in terms of monetary cost and expense in time, water and land use. we dont need another fence bound freeway in the Avra valley, money should be used to improve existing infrastructure. It is truly amazing that the project is under consideration at all.
- I wholeheartedly oppose this interstate highway expansion. It is totally unnecessary and risks harming undeveloped desert areas. We need to protect and preserve our land and resources, not build more roads.
- You must think for 7 generations. Think into the future. We do NOT need another freeway. We do NOT need to rush people to Vegas to act stupid and lose their money. NO NO NO
- This whole idea is such bs. Benefits few and destroys natural land and habitat.
- I agree with the Sky Island Aliance and others that there is no need for a new freeway. We oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. Sky Island Alliance is in agreement with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." Under the right circumstances, we could support enhancing or expanding the existing I-10 and I-19 freeways, mainly through introducing high-capacity transit, to reduce congestion and accommodate future commuters, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.
- Please don't build this highway :(
- ADOT can't maintain roads it has, huge buffelgrass increase in Green Valley, Tucson hampers local efforts to control threat to life, property, and ecozone. Nor can DPS patrol effectively I-19 so narcos move when they're not around. Make existing better rather than disrupt more areas!!!
- Please, no corridor. Improve rail system for humans and freight.
- How much traffic is estimated to be diverted to a new highway structure?
- In areas south of Phoenix metro, would rather see expansion of existing interstate highway capacity. No new highways or corridors outside of existing major roadways. Possibility of enhancement of state route 60 or other options to bypass Phoenix metro, especially for freight, would be the only area where new corridor or routing should be considered.
- "1. SCOPE a. The scope of the current Corridor Study Area for the Nogales to Wickenburg EIS appears to end short of State Highway 71. I would recommend that the study area be expanded to the north to encompass the Highway 93 – Highway 71 interchange. The basis of this recommendation is given below. b. The scope (either as is, or expanded) does cross Yavapai County. The EIS handout notes four counties

(Maricopa, Pinal, Pima, and Santa Cruz), but omits Yavapai County. Please correct this omission. 2. ROUTE a. Avoid the existing Hwy 60 – Hwy 93 route thru Wickenburg. i. Due to the narrow corridor of the existing roadway, and the adjoining built-up areas, it would be necessary to demolish or relocate many existing structures to allow for the increased width of the interstate ROW, as well as the required frontage roads to service the numerous driveways and entrances along this route. Most existing utilities that parallel the existing corridor (electric, gas, water, sewer, phone, internet, etc.) would also need to be relocated at a huge expense. ii. The proximity of the Hassayampa River immediately west of this roadway would also create potential impacts to that riparian ecosystem and watershed. iii. A route using this existing corridor would not mitigate the current traffic congestion and noise, but would only worsen the impacts to the residential areas from the increase in through-traffic that would occur with the completion of an interstate highway. b. A much better route would be to leave the Highway 60 corridor in area of Morristown / Gates Road, then proceed southwest of Wickenburg, rejoining Highway 93 corridor around State Road 71. This allows: i. A connection into Wickenburg from the south via Highway 60. ii. A connection into Wickenburg from the south via Vulture Mine Road. iii. A connection to Highway 60 West without traffic needing to pass thru downtown Wickenburg. iv. A connection to Highway 71 that would provide a good access north to the cities of Congress, Yarnell, Kirkland Junction, and Prescott. v. A connection into Wickenburg from the north via Highway 93. vi. All construction and thru-traffic would bypass the congestion of downtown Wickenburg, all impacts to homes and ranches on the private lands north and west of Wickenburg, the Wickenburg municipal airport, the Matthee airpark, the BNSF railway, and the Wickenburg Ranch development. vii.

Construction of the I-11 roadway through the undeveloped desert areas south and west of Wickenburg would impact the desert ecosystem, but those impacts could be mitigated or offset by faster construction times (from fewer interferences), proper drainage and revegetation, avoidance of historically significant or environmentally sensitive areas, provision of wildlife transit paths under the roadway, etc. viii. With new construction, not bound by existing facilities, the road grades, curves, stream crossings, etc. can all be optimized to meet current highway construction standards. Quicker construction, without the hindrance of maintaining traffic flow over alternate routes, will also result in lower construction costs. "

- The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West. Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.
- I am strongly opposed to this I-11 project. We need to spend these funds on alternative (like rail) transportation.
- We don't need another freeway. I10 and I19 are not congested, and could be widened if needed in future. We should be implementing policies to reduce road traffic, not increase it. History shows that more roads lead to more traffic.
- I oppose a new transportation corridor. It is not necessary and will cause irreparable damage to regional wildlife movement.
- I think we need to focus on alternate transportation (i.e. rail) instead of adding additional highways.

- The only truly useful purpose of I-11 would be bypassing congestion in Maricopa County north out of Phoenix via I-17. An alternate route to northern Arizona would facilitate travel into/through the central valley of Arizona. New freeways in Pima county would be detrimental to the existing communities. The only benefit would be for land developers to utilize federal funding to expand their access to new business. Such spending would be a tax payer burden for the exclusive financial gain of land developers and should be removed from the proposal.
- Why don't you focus on urban congestion rather than on a slash of highway that nobody needs? Why is it that the roads in Tucson are in such bad repair and yet you want to start new projects? As a taxpayer, I am mortified.
- I am vehemently opposed to this freeway - for the sole purpose of commercial transportation for people who do not live here - as unnecessary and the cause of more air pollution, accidents, and truck traffic. There are too many important cultural and environmental impacts that cannot be restored or reclaimed with the existence of a new freeway. They will be lost to Arizona forever. Southern Arizona is one of the most biologically diverse regions in North America. We as Arizonans must protect it. A freeway does not do that. This freeway may enhance the finances of some, but it will badly impact most of us who live near and in the corridor. Our real estate values will likely decline. And, we may loose eco-tourists who visit Saguaro, Ironwood, and Organ Pipe. If this freeway is built, then wildlife bridges and underpasses must be included in the plan. These bridges must be placed at known wildlife corridors and ADOT will work with southern Arizona recognized conservation organizations.
- As noted above, this survey is biased and illogical. Note that impacts can only fully be evaluated with a "no action" alternative, yet the survey is presented as if there is no such alternative. Also, it may be that only one portion of the corridor (e.g., an alternative route around Phoenix) is needed. The options as presented do not indicate that new development could be integrated into the existing transportation system with only some places where new construction is needed. This is a very important public process and should reflect a much higher level of knowledge and understanding than is in evidence in the design of this survey. There is considerable expertise in conducting EAs and public scoping within Arizona; I suggest you contact environmental consulting firms or applied research units within the state universities for assistance.
- The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West. Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.
- I travel a lot in this region. There is no need for a new freeway. This is an un-creative, brute force psuedo solution. No need to by pass I-10.
- I made my comments above. I still do not understand what anyone could be thinking to run parallel freeways and sandwich our beautiful village in between. I just cannot imagine how terrible it would be. Please consider widening one freeway where it exists and connect to a new one when necessary. Thank you.
- Why in God's name would you want to put a parallel road to I19 and I10????????? GO AWAY! Every time I turn on the news, the world is getting smaller and more intrusive,

encroaching on people who wish to live peacefully and in areas not overdeveloped by government agencies who want to spend money. Stop trying to "help" us! Please, spend the money somewhere else, on some other project. I have lived in this area for 43 years and I've never thought, "You know, what we need is a big freeway loop through the state, that would just really improve life." In fact, the reaction of everyone who has heard about this has been EXACTLY the opposite. Please do not build this and further disrupt the tranquility and beauty of one of the state's most pristine areas. No one wants to be trapped inside a major state highway loop, what exists is more than sufficient to service the traveling needs of people in the area and in the state. #NOI11

- Rather than building a new Interstate where one already exists ( waste of money ) widen I 19 from Tucson to Nogales and build I 11 from Phoenix to Reno also connect I 17 from Flagstaff to I 15 in Utah
- I-10 through Tucson is so very dangerous, in the past 5 years since living here, the traffic has substantially increased making commuting very dangerous. It makes sense to divert big rigs and others traveling through to another route, making it safer for all. There is currently no other way out of Corona de Tucson except I-19 which is just as dangerous, so an alternative for travelers through is good for Tucson.
- Highway 93 has continued to be a dangerous road. It is sometimes quite difficult to gain access from our residential area. I am concerned that this will get worse with the I-11. I fear it will be a "drug" throughway.
- I-11 provides and opportunity to add capacity to our infrastructure and primary trade corridor that will not only relieve congestion from current roadways but support growth into the future. A great opportunity for Arizona to demonstrate its commitment to trade with our southern partners in Mexico.
- Concerns about pollution noise And enviroment vegetation and animal
- Try to use as much existing infrastructure as possible. The biggest bottleneck and time consumption in the route from Mexico to Wickenburg is the Phoenix area. Try to avoid it.
- WEST OF I-19 OR I-19 WIDER DOES NOT AFFECT AS MANY PEOPLE-I SEE YOU CANNOT CROSS THE INDIAN RESERVATION WHICH IS VERY SPARSELY POPULATED. RUN MORE TRAINS, IF NECESSARY.
- Follow Highway 93 south from Hoover Dam. At a point approximately 10 to 15 miles north of Wickenburg turn west through a dessert route with the least impact on the environment & head toward 1-10. It would not be wise & in fact dangerous for I-11 to go into the area from the Congress Junction past the Wickenburg Annex north of Wickenburg to Wickenburg. There are six roping arenas in Wickenburg and on any given day hundreds of horse trailers travel back & forth in this area. Please provide an exit from I-11 onto the current Highway 93 north of the congress junction. This would leave Highway 93 for the horse trailer & local traffic only. It would be the most prudent & safest alternative.
- I travel to Tucson from Tubac every day. Why can't the money be spent on widening I-19? Designate 1 lane for semi use as is done in Europe?
- Do not want corridor through thunderbird farms or hidden valley
- I'm shopping for a house in the Picture Rock area, but this talk about I11 is making me REALLY nervous. If it were to go near that area my new house would be worthless to me. The whole reason I picked that area is so I could be near the parks and wildlife and avoid all the traffic, noise and pollution. I'm terrified of buying a home and then it ends up useless to

me and I won't be able to sell it either. No one is going to want to live near this thing folks. It's kinda insane that it's even being considered. No matter how bad the traffic or what the economic impact it just isn't worth it. I'd rather pay more taxes, make less money, wait in traffic than see this I11 go through the rural areas around Tucson. IT WILL DESTROY TUCSON. It will obliterate all the things that make the greater Tucson area so appealing. If this thing goes through I may decide to back out of moving to Pima County completely and start looking at New Mexico. I11 may look like a solution, but not for Tucson. I've been a part-time resident of the area for 20 years. It's one of the best places to live in the country in my opinion. But if I11 goes through that area it will be the beginning of the end for the whole community. Here it is 2016 and decisions are still being made based solely on money and convenience for a few while selling out the many and flushing the future down the drain. I thought we had learned better.

- makes me sick to see we haven't finished the 6 lane from Tucson to Phoenix !!!!!!!!!!!!!!! and now you want to add another one .. sickening
- Thanks for allowing all the input with feedback that you have done. Shows you actually care what we think :)
- We need a better alternative to moving people throughout the state. Current interstates are too congested.
- If the route on the east side of the railroad tracks is becomes the route site, numerous homes and private properties will be destroyed.
- We, the people, voted NO to this expansion in our elections in November 2015. How dare you override our voice with your economic "progress"?
- A HUGE WASTE of money, time, energy and environmental impact when so many other issues effect thousands of REAL AMERICANS every day, every year!!!
- I would prefer a rail option that connects cities in Arizona where you could get from Nogales even up to Las Vegas rather than more highways. Arizona needs more and more reliable public transport rather than more private vehicles on the road.
- There is no need for an interstate that is only 10 miles away from another one running the sAme direction. This only serves to increase the cost of the project and negatively impact more people and resources such as wildlife, water, plants, open space,etc. the only people interested in running I 11 through Avra Valley are developers who stand to gain by a new transportation corridor . Build the new interstate as a link to I10 and I 19. Use what we have already got. Thank you
- There is no need for another interstate 20 miles parallel ot the existing one, there is already room needed on either side of the alternate choice and Avra Valley does not need to become a dust bowl instead of home to the wildlife mitigation corridor, the Desert Museum, many long term residence and the Reservation. There is something precious along the proposed route for Avra Valley, and that is the absence of growth, business and interstate connections. The natural state of this area needs to be preserved and the other route would also be so much less expensive. The push for choosing Avra Valley is disturbing in it's disrespect. Thank you for asking.
- The Mayor of Wickenburg is desirous of I-11 routing to the west of his town and avoid the Vulture Mountains (I agree). It appears extremely logical to me to have the new freeway use I-8 then proceed northwest, to the far west side of Buckeye. Then take I-10 west to the west side of the Hassayampa, then nearly due north to the west side of Wickenburg. This route

would not interfere with Sun Valley Parkway, keep noise to a minimum for several thousand of us living near Patton Road, east of the Hassayampa. In the mean while, I believe you could wipe out the "Whispering Ranch" area (it needs to be destroyed). Sincerely, GL Hansen

- NO INTERSTATE 11!
- DISTRESSED ABOUT ALL OF THE DEVELOPMENT-TOO MANY PEOPLE & TOO MANY DEVELOPMENTS (USUALLY SAME BUSINESSES OVER AND OVER= HOMOGENIZATION)
- There is no reason to build a new road. From the south, almost all the way to the northern end of the Corridor, we already have plenty of road. If it is felt that these are congested, the State should look into building a passenger rail and, to make it useful by supporting the development of connecting lines in Tucson and Maricopa. If new roads are to be built (or current roads super-sized) please do not use my tax money, whether it be Federal or State. Make them toll roads. Raise the gas tax and use the HURF funds. Make them pay for themselves. In a state that never has money for education or medical services, every road is supposed to provide tremendous "economic" benefits. No, they do not. They have devastating environmental impacts which undermine our quality of life and destroy many businesses, particularly tourism. The whole point of this project is to move cheaply made products from China or Mexico. We subsidize this cheap labor by paying for their transport with our taxes. No Thanks.
- Hopefully my comments are taken into account.
- This would probably be much better received if it were presented as and actually was an I-10 / US-93 Corridor improvement rather than a "new" corridor. Unless transportation funding increases through tax increases occur, Arizona does not have sufficient funding to maintain its existing transportation network let alone fund the construction of "new" corridors. We may be able to keep the riding surface in an acceptable condition, but this comes at the ever increasing cost of more frequent surface preservation operations due to the dilapidated underlying depths of the pavement, base, and subgrade material that exist beneath Arizona's state and interstate highways. But most are unaware of this because when we mill and overlay a section of road, it "looks" like a brand new road when in fact it is a money pit that Arizona tax payers will need to sink ever increasing amounts of tax dollars into in order to maintain. No new corridors should even be whispered until the existing corridors include a legitimate, high capacity alternatives to the passenger car; high speed, high capacity transit/rail. The benefits to doing such are endless and long term costs are significantly less than continuing to pave Arizona in a manner that does nothing but increase Arizona motorists propensity to drive, congestion, and the economic costs associated with such. Improve the southern half of the corridor by putting in high speed rail between Phoenix and Tucson. Improve the northern portion of the corridor by expanding US-93. The resulting decrease in congestion on I-10 between Phoenix and Tucson would likely be so significant that the need for discussing improving the corridor, or a "new" corridor, would evaporate into thin air. The obvious route from Nogales to Las Vegas is I-19, I-10, what will be the South Mountain Freeway, I-10, Loop 303, US-93. Has California not provided us with a clear example that building new freeways is a poor choice for improving efficiency; it only works if ZERO development occurs along the new freeway. If we are trying to improve efficiency, let's make sure we put our efforts into something that might actually allow that to happen.
- This entire project is driven by commercial interests and their cronies in state government. There is no core public interest that says we need this expanded highway. Call it the XL



pipeline of highway projects. We need to be looking at sustainable growth with, at the very least, high-speed rail or other means of transport. Stop this project, please. More trucks, more pavement, noise, pollution, habitat destruction, warehouses, roadside sprawl -- this is not a viable future.

- I was at the Buckeye presentation and was impressed with the knowledge and concerns of the study group there.
- dont let economic and political consideration over ride biological values such as existing scenic byways which are currently important to tourism and environment
- East-West superstreet ( not freeway) should be considered. Extend southern Av from hwy 85 out to new I-11 .
- Thank you for the opportunity to voice our opinion
- I think the places where the new freeway will be separate from an existing freeway, building it as close to the existing freeway as possible would make both freeways an easy alternate route for drivers should a serious accident occur on one of them or during future construction on the new or existing freeway.
- Please do nothing. Use what exists now. Improve the road surface on I-19. Repair the bridge on I-19 at San Xavier Road. Use our limited resources to improve what we have now.
- Just not needed!!!
- Keep up the good work ADOT! Thank you.
- Multimodal model should evaluate new international airport SW of Wickenburg, to tie into freight and commuter connections along corridor.
- Your corridor as you mapped very costly! ! Need to find a better solution
- Thank you for getting started on a much needed infrastructure improvement in Southern Arizona.
- I've been to some of the previous public meetings. At first, the Q&A was done with the entire audience: but apparently that revealed too many controversial subjects, such as using tolls to fund the construction and maintenance, to too large a group of citizens, so now these "public" meetings conduct the Q&A with individuals instead of the entire audience. I consider this an underhanded and deceptive method of limiting the information actually provided to the public. That said, the overall concept of a multi-use corridor is good, but using tolls for construction and maintenance of any part of it, ESPECIALLY IF CONTRACTED TO NON-AMERICAN COMPANIES, is not acceptable! It has failed in too many other states/locations, and left the taxpayers on the hook for sizable deficits payable to those foreign enterprises. No Tolls, and No off-shore contracts!
- Please look for another alternative to the very sensitive Mile Wide Sandario area.
- With no funding in place for this project and the time it has taken to designate the I-11 Corridor in the current Federal Transportation bill, I suspect I will never see the finished product.
- For Tucson area I strongly support a route west of the Tucson Mountains that would link with routes to the west, southwest, and south toward Nogales, If the goal is to increase commerce why not provide more options to access other under utilized areas of Arizona and northern Mexico. I do not support using I-10 routing traffic through downtown Tucson.

- Why waste money on a highway we already have, I-10, I-19. Instead just expand these and add I-11 from I-8/I-10 junction to Las Vegas? Do we have too much money and need to spend it on anything???
- I am attending the meeting June 22 from 4-6 to hear the work. Please mention that you have thought about the consequences of this project not just in capitalist growth terms but responsible ways thinking of affects.
- Like I said before we moved out here to get away from city noise freeway noise and putting the freeway through our Corridor would not make us happy, we would be forced to move from our happy community
- Expand I-11 corridor as close to existing I-10 as possible
- Invite border patrol to meetings. We will need checkpoints to deter drug and human smuggling.
- Put it East of 10 so Tucson residents have easier access to connect to 10 when heading north.
- Arizona & the DOT screwed up severely by not having a future vision & proper planning when rebuilding I-10 & I-19, when rebuilding them there was more than enough land space and room to allow more lanes in the existing corridor,, There is NO NEED to ruin any other areas,, Such a bad idea needs be tossed out NOW,, it is a waste of money and a ruin of scenic, clean air lands,, WAKE UP FOOLS,, it is a very DUMB idea, Signed Bob Morgan 85736,, Avara Valley land owner
- I would have voted for the Bond Package back in 2015 if it did not have so much pork and there were clear limits on how the funds would be used.
- The most realistic and least expensive alternative seems to be re-doing the existing I-10; double-decking it and/or widening it.
- Please do something about death rate on I-10 now!!!!
- How will this affect tourism & business in Tucson, by by-passing the city? Every city I've know to have interstate routed around it loses millions in business & tourism when they can just proceed to Phoenix or Vegas.
- No Tolls, Toll roads are okay for faster alternatives but not replacing vital thoroughfares like the only road between Vegas and Phoenix. there needs to be a way to go from the 515 in Vegas to at least I-10 without getting off the freeway (when I say free I mean it) that includes a straight connection in Kingman (which I didn't see in your plan) and freeway through Wickenburg (no city streets no more Wickenburg speed traps). From Wickenburg you can either extend the freeway down the 60 to connect with the 303 or continue a freeway down south down the way of Vulture Mine Road and Aquila Rd until it hits I-10. A nice to have but not a necessity would be to continue the I-11 freeway south of I-10 to I-8 using the Phoenix bypass, the 85. I would add as little new freeways as possible, replace the 93 and the roads after Wickenburg to the freeway with new freeway, but that is it, the rest of I-11 should share with the existing I-10 and I-19 (you could even call the whole I-11 I-19 if it made more sense) expanding those roads rather than building alternative freeway paths parallel to I-10 in southern Arizona makes a lot more sense.
- At the very least Green Valley deserves sound abatement walls in residential areas, left-lane-only truck traffic designation in both directions from Canoa to the casino, and a

comprehensive plan for evacuation, medical aid and cleanup in case of hazardous waste spills.

- We do not need the I-11; I have not seen a valid study that expresses this need.
- Please hurry and get the project started we need it to relieve are rows and congestion and help with the neighborhood travels to and from Tucson thank
- Hopefully, the wisest cost-effective option is selected that best serves the long term objectives of the corridor while giving careful consideration to all of the factors and interests involved.
- none
- Please do not add another freeway to Pima County! We don't need it! We need I-10 widened from Campbell/Kino to SR 83... Concentrate on what you have and make it better before building new. I support the proposed I-11 from Casa Grande to Nevada only - and only if it utilizes the same path that was just widened and improved from west Phoenix to I-40. If this freeway goes in, that road work will go to waste! It is a shame!
- This is long overdue and very much needed.
- Please contact me early in the process so we may locate for you our facilities in the proposed corridor.
- Please do not build I-11 through the Estrella community in Goodyear. Please take the route on MC-85 from I-8. Thank you!
- Develop a tunnel through the Phoenix area with no speed limit.
- Please consider the cost-benefits of using a rapid rail route from Phoenix to Tucson and beyond as opposed to digging up more earth and carving 6 lanes of traffic into the earth.
- I-10 is more than enough freeway for us. Why don't you spend the money on fixing roads instead of building new ones we can't afford to fix in this economy?
- Just build it. The US 93 Corridor to Las Vegas is a death trap. Enough studies have been completed. Build the Interstate. I-10 South from Buckeye to the Gila Indian Reservation is a parking lot. Build I-11 NOW.
- Thank you!
- I believe there is a better alternative. Expand I-10 .our wildlife is being slowly obliterated. If you destroy their habitats shame on you and your future generations....
- Don't export jobs to Mexico with "nearshoring" & "integrative manufacturing."
- I favor a new corridor through the Avra Valley to bypass Tucson. This could be a high-speed toll road with few interchanges. This should connect with the proposed Sonoran Corridor to connect to I-10 east of Tucson. It should include wildlife overpasses. Expansion of existing I-19 would be adequate south of Tucson. However, development priority should be given to the section from north of Wickenburg to I-10.
- It is irresponsible for government and elected officials to disregard the will of the people's vote in Tucson - it was NO to the Sonoran Corridor and this freeway - and yet, here it is coming up again. It is irresponsible to build new roads in Tucson when we can't maintain the ones we have. Any I11 in Avra Valley MUST be avoided. We need to protect wildlife and our precious Sonoran Desert. And the lack of integrity of the PIMA Board of Supervisors is VERY disturbing ... they are totally disregarding a resolution that was passed

by them several years ago which mandated protecting the Sonoran Desert from development. And this is unnecessary. The ONLY I11 option I could possibly consider in Tucson is if they use I10. Also, the I11 double-decking option will save taxpayers \$2B. We need so much more than an economy - that ever growing and never satisfied bloated body of governments, developers and multi-national corporations. And unless we realize that, we will soon lose what makes us human.

- How much is this highway estimated to cost? Why build it. There seems to be no real need for it. It will destroy more and create more environmental problems than it will solve. It will cost too much, destroy too much, provide too little benefit. The money should go to schools, infrastructure, local social services.
- I-11 needs to be planned to facilitate future connection to growth areas, specifically the east valley including Florence and Coolidge via a 84/ 287 connection. An Avra Valley route west of Tucson mtns should consider future connections to a Pinal County Parkway and a Sahuarita Rd. Double decking I-10 in Tucson is unacceptable.
- I support intertwining I-11 with I-10 from Tangerine Road thru to I-19.
- Rather than new routes being constructed, current routes need to be widened if possible and traffic should be reduced via improved regional mass transit.
- This is a folly. While needed, there's no obvious funding source. I'm 57. If this happens, it could be 25 years. Toll roads are the only way to fund this quickly.
- Finish widening I 10 near picacho from 2 to 3 lanes. It's ridiculous all the accidents in this area. If adot is restricted in \$ for rd projects allocate \$ for this area first before i11.
- Im having trouble finding the map of the proposed route ...and recently purchased a horse property in Wittman...im concerned with the location of the new freeway and how close it will be to my home .....we also were planning on buying a property in wickenburg and wanted to know where is best to purchase .....I really don't like freeways...thank you
- Maintain a sense of urgency to move the process forward and begin construction as early as possible.
- ADOT must stop swallowing up Indigenous lands for the end goal of enhancing and improving commercial transportation. ADOT is killing the earth.
- In addition to causing substantial damage to natural and cultural resources from construction itself, the proposed route of the Sonoran Corridor is likely to compromise habitat connectivity throughout the region with severe impacts to some of our most prized pieces of public land, such as Saguaro National Park, Sonoran Desert National Monument, and various State Trust, BLM, and National Forest land. As an alternative to construction of a new interstate highway, I would support the improvement to the infrastructure of Interstate 10. Improvement of I-10 would still increase transportation connectivity and mitigate future increases in transportation demands while minimizing the potentially devastating environmental impacts and costs that would be carried on to the taxpayers.
- I think it is a waste of taxpayer money to have this project in process as the same time I-10 was being widened. Should have double decked it right then and we would be done. It seems the decision makers have their own agenda and our input is just a show.
- This must be built as a separate entity from the existing infrastructure. it makes no sense to try to merge with double decks or widening I-10. this will just clog things up during construction and will not alleviate future congestion

- If this is intended to be a truck route than concrete should be used as a final paving solution.
- Humans have many ways to move, transport goods and provide economic development. The natural systems do not, they are rare and threatened.
- I think this is great idea. Even better if you attach a light rail or speed train system to it.
- Inasmuch as possible, I would prefer to see development/re-development concentrated on the existing I-10 and/or I-8 corridors. Particularly at the southern end of the proposed corridor, traffic congestion is not problematic and thus creating all-new highways seems uncalled for. Furthermore, more emphasis on alternative modes of passenger and freight transportation (e.g. rail) to relieve congestion would be preferable to new highways and corridors.
- I-11 is unnecessary and will only have an adverse impact on the environment. The little benefit provided by its construction is not justified for the expense or impact it would have on the environment or communities. This project appears to be intended to help a minority group, rather than be a benefit to the majority.
- I think everyone involved in the conception and planning of this proposal should return their wages as this is a complete waste of our tax dollars. I cannot believe we pay people to come with such sophomoric ideas. Shame!
- I don't understand why a new route from Nogales to Casa Grande is being assessed when I-19 and I-10 are already in that exact location. If a new I-11 route is planned for this segment I would consider it fraud, waste or abuse of tax payer money. A route from Casa Grande to west Phoenix may reduce trucking congestion on 10. An interstate from Phoenix to Vegas should be the focus. Overall I like the idea starting at Casa Grande. I don't see a need for something new starting in Nogales.
- Although this is probably impossible, make the decisions based on data and the leadership of trained transportation engineers and experts ... not politics and politicians. Sure, the public should have input, but let the engineers make the tough calls without the influence of politicians. Politicians will get it wrong.
- I object to any new transportation corridor directing traffic through prized pieces of natural public land and potentially farther from our two biggest cities. The Las Vegas region and other out-of-state interests will certainly benefit from shunting more wealthy foreign tourists in their direction, but the costs and benefits borne by each state seem disproportionate. We direct more trade to the north of us, and potentially lose precious natural habitats that can't be replaced. I also object to the inclusion of "national defense needs" as a potential topic of interest. This seems rather like a red herring to distract from real impacts, evidenced by the report listing it as an intangible benefit, and thereby shielding it from real debate.
- I think it's a mistake to have a corridor run through any national monuments or national forests. I also think the resources would be better spent improving existing roads.
- We don't need this road!
- "June 9, 2016 Comment relative to the Southern section of the I-11 corridor between Nogales and Casa Grande as described in the public meeting in Casa Grande on June 8, 2016: Items:
  - Santa Fe Railroad is promoting a major switching yard in the area of Red Rock south of Eloy and north of Marana, though opponents cite challenges around environmental issues.
  - I understand there have been discussions about the possibility of an Inland Customs Port that would be associated with the Red Rock switching yard, the objective of which would be to take some of the pressure off Customs operations at Long

Beach, California. • The proposed switching yard appears to be within the I-11 Corridor geographic parameters. • There has been discussion about a major seaport in Mexico that would provide further U.S. and Mexican access to Pacific markets, and inbound freight from Pacific trading partners. • Rail right of way is an option for the I-11 Corridor. If this right of way option were to become a reality, and border to Red Rock were to become an actual rail access route, would there be utility in using the possible Inland Customs Port for freight coming from Mexico, and from Pacific trading partners via Mexico? Would this relieve some of the pressure on the Nogales port of entry? Question: If there is a possibility of a Red Rock Inland Customs Port becoming a reality, and if rail from Mexico to this port were a possibility as well, should the planning team include input from Customs and potential rail operators? "

- Start the road in Nogales and build to the north.
- Don't let the environmentalists screw this up!
- Double-decking I-10 would be preferable and better address the needs of my community.
- We don't want or need this freeway. Keep it out of our area.
- I only heard about this by accident today and so missed the presentation in Casa Grande. You can be sure I'll be attending one in Tucson or Marana if at all possible! People in potentially affected areas should be getting info through direct mail! It's unbelievable how secretive this process seems to be. :-)
- How is Arizona going to pay for the maintenance of this? ADOT does an amazing job with what they have, but it simply isn't enough to keep up with demand. Big rigs are vital to our nation, I get it, but between that and the clowns we have driving around, ADOT simply cannot maintain what they have at the pace required - again they do an amazing job. I think something else to consider into this, even at the federal level, would be investing in new building materials and designs to help harden our roadways. My concern is taking away our lands and the money.
- I am worried that the alignment of I-11 will create even more new housing sprawl out in the middle of nowhere. To avoid this, the alignment really ought to be built near existing developments and perhaps even include provisions to limit new construction of cheap houses in the middle of nowhere. Rules should encourage "smart growth" and support existing communities rather than contribute to more sprawl. An urban boundary should be established around the Phoenix metro area to reign in all this unnecessary and unsustainable development. I-11 should be designed to support infill developments.
- Construction near the historic Gillespie bridge and adjoining biologically significant riparian wetlands should be avoided. The new bridge across the Gila River should be built further south such as at Patterson Road, the roadway should be built over Enterprise Road to the intersection of old highway 80 west of any riparian habitat. South of Lewis prison, an interchange and frontage road exist which could foster the transition of the I-11 route from the existing highway 85 corridor where it would veer to the west, crossing old highway 80. I am a resident in the corridor study area southwest of Buckeye. I am in Colorado this summer, but would like to attend the June 15 meeting in Buckeye by telephone if at all possible. Please contact me. I will be emailing in further detailed comments. Thank you.
- What are the limits to growth and development? A plan is needed for 50-100 years in the future.

- An alternate route from Tucson to Phoenix is about 30 years past due. Truly hope this plan will get moving quickly.
- The future Interstate 11 needs to be a high priority for federal and state officials in order to safely transport people and freight from Arizona to Las Vegas. The current US 93 is inadequate and a dangerous road to travel, especially considering it's a NAFTA trade route and some of the road is still single lanes in each direction. A freeway is vital to keeping people safe as they travel to and from Las Vegas from southern Arizona and the Phoenix metropolitan area. Hopefully this freeway can be built ASAP and not 20 years from now. Please don't drag this out too long and start building this vital freeway link from Southern Arizona to Las Vegas ASAP. Thank you.
- Thank you for the opportunity to give input . The corridor is a needed addition for ensuring our community job health into the future, however this is a very fragile area in the SE sector. We need to ensure the wildlife habitat that is remaining, improve the accessibility to optional transportation to both Tucson and Phoenix. A rail corridor would fantastic! Also, we need to consider if there will also be increased freight train traffic we need to ensure safety at crossings and improve the tracks to ensure safety of transport of hazardous goods.
- Instead of building new freeway between I-10 & I-8, simply enhance AZ85. This will cost substantially less.
- would this corridor be a 1 direction (north & south) and how many lanes
- NO I-11 . Keep it out of Avra Valley and Saguaro National Park West. This is a stupid project, a waste of resources and totally destructive of our Sonoran desert environment.
- Recent sightings of desert bighorn sheep in the Tucson Mts. (first since the 1950's) are a concrete example of what we stand to lose if I-11 is built thru Avra Valley. Other options, including double decking I-10, should be pursued. The existing I-10 corridor is already heavily impacted by traffic noise and pollution. How much more of our priceless natural heritage must we sacrifice for the sake of moving more auto and truck traffic?
- The study map should include areas of I-11 expansion north of Wickenburg to as far North as reasonable
- You bulldozed Central Arizona Project through this area with a 1500 right of way, to be used later for a "divided roadway". What are you doing with all of that right of way that is in the same area you want a new freeway to Mexico? Why do you keep taking and not using what you already have taken? The natural area's that are protected now will have another barrier to free access by humans and wildlife. You will turn this area into an industrial area with the noise, light pollution, air pollution and a road that takes us to Phoenix or Nogales. We shop 20 minutes away in Marana and NW Tucson, just a little closer to home. Thanks for no invite to the meetings I have missed since you hide the notices in small type and nothing until after the meeting is over comes out in the newspapers.
- Ideally the new I-10 would run through Tonopah and Buckeye heading South to help traffic from California and Las Vegas
- Please add me for any mailing list on this issue.
- We do not need to spend the money on this project
- We have live within a 1/2-3/4 of a mile from I19 for the past 12 yrs. In that amount of time the noise from truck traffic, motorcycles, cars has increased substantially & now is 24/7. Use of our patio has been reduced both by the amount of noise we hear & by the dust that is



generated by so much traffic. We cannot imagine what additional truck traffic will do to our enjoyment of outdoor life & a good nights sleep. Green Valley is completely ignored in this study; no hearings to give residents a chance for input without traveling 40 or 50 miles. There are over 20000 residents in GV & several thousand live close enough to I19 to be greatly impacted now & in the future. If you want support of this community you had at least better include sound walls or some other form of noise/dust abatement.

- Just widen I-10 from Phoenix south. 3 lanes minimum! Concrete barrier in the median! Stop the backups caused by crossover wrecks already.
- Please keep that highway out of the Avra Valley!
- Start the I-11 ASAP!!! Stop wasting time
- I am for the project.
- I hope that big developers will not prevail in securing the final alignment that is beneficial to them. The livelihood of many medium and small communities is at stake and an alignment near these communities would help their economies greatly.
- We need a high speed rail from Nogales to Las Vegas, Los Angeles and San Francisco. Please help!
- It is obvious that land developers looking to profit from the construction of a new interstate route are garnering the favor of local politicians and thumbing their nose at local concerns and the federal designations intended to protect AZ natural and historic treasures. Disgusting!!!
- Rail is a FAR more efficient, cleaner and safer way to transport goods. If the primary goal of this road is to improve cross-border commerce and get semis off our smaller north-south road, I think that's great! But don't do it with another road. Freight rail is a better system, but we don't have sufficient infrastructure to make it the most accessible. If a lot of money is going to be spent, spend it on building THAT infrastructure, NOT another road.
- Why is I-11 corridor study so close to I-10 & I-19? Shouldn't an alternate route be considered (ex. use SR 85 to Lukeville?)
- We desperately need something to help with the traffic and commuting in this town. We need to catch up with the times and build more freeways. Our roads and freeway is so outdated. Look at Phoenix. I can travel all over that town so much easier and quicker.
- And yet again, you schedule meetings that do not allow the general public an opportunity to attend. I mean seriously, who do you think can get to a 4:30pm meeting when most people work? You continue to ignore what the public has voted for and that is NO I-11!! Stop pushing it on us and start developing I-10 the way it should be! No one is going to fight the expansion of the current freeway system, which hmmm, does lead to Nogales via I-19 and oh yeah that's right, you can branch off of I-10 to get to Wickenburg also. Hmmm, think you might want to really consider improving I-10 before you go off and tear up the land that no one wants you on!
- Your survey is very disingenuous in that it presumes I agree that building this new freeway is a good idea in the first place. I think it would be a misallocation of limited resources and there are better ways to solve our existing traffic congestion problems than building a new freeway along side existing roadways.
- Who ever pulled this idea out of their ASS , should be shipped out,, it will ruin an area that we, the citizens of, consider special for "WHAT IT IS" , NOT WHAT OUTSIDERS WANT IT

TO BECOME. another mess like the Ararco mine tailings eye sore that can be seen from the Moon. Get over it. Feel free to contact me as I don't have a problem telling it like it is!!!  
Signed Bob Morgan

- I think I-11 is a total waste from a local point of view. We need improvements in the freeway system, but NOT that!
- Please consider other routes than through the Avra Valley west of Tucson.
- We do not need more urban sprawl! The desert must be preserved! WE DO NOT WANT OR NEED A FREEWAY IN THIS CORRIDOR!
- If there is even a need for this corridor at this time certainly piggybacking the already existing I 10 or using rail way tracks the most environmentally correct. It is also less \$. Tourism in So AZ also greatly impacted. In the Avra valley area traversing Saguaro, which is all I can speak to, has a mitigated wildlife corridor, the reservation, a state and national park, the Desert Museum and the Gates Pass overlook. These generate 100,000s of tourists and dollars every year. On a personal level our entire neighborhood will be destroyed and the loss of property value which is significant for the 1000s of people who call that area home and live there for the natural beauty.
- The protection of our natural and historic resources in Arizona is of critical importance, and I think we should focus on the expansion of existing roads to service future growth. Focusing on existing infrastructure allows needed investment in aging roads, minimizes impact on communities and the environment, and preserves the open space aesthetic that Arizonans value so much.
- TRAINS TRAINS TRAINS TRAINS NO NEW ROADS PLEASE
- Thanks for the opportunity.
- I would prefer to see congestion alternatives include a focus on providing alternative transport options (i.e. rail, bus, etc) than to create new highway systems.
- This is an old-fashioned expensive filthy tragic transportation mode. We need railroads, not more interstates. Please don't build this thing or even spend one more tax dollar thinking about it. Thanks
- Sonoran desert NP has to be crossed. maybe along eastern edge close to Casa Grande and Maricopa. A route here would also improve access to these communities.
- I 11 is the wrong approach. A much better solution would be to invest in the two freeways already in place. Extend I 19 up through Oro Valley, Florence, and hit the new San Tan Valley freeway, providing alt access to Phoenix. Then build a connector from I 10 around Buckeye up through Wickenburg and Las Vegas.
- Please focus your efforts on improving current transportation routes, rather than on constructing any new routes. Thank you.
- This is a rural area. People move out here to get away. Let's learn to live within our means and not favor or accommodate the automobile anymore. Question one is biased and should also include not important. Least important still implies that there is some importance to the category.
- The sighting recently of Desert Bighorn Sheep in the Tucson Mountains is just another in a long list of negative impacts that I-11 would have on the Avra Valley and the surrounding National Park, County Park, Native American lands, & the Arizona-Sonora Desert Museum,

reducing movement through those corridors. Air quality, light pollution, noise pollution would also greatly affect the area and adversely impact the Sonoran Desert Conservation Plan. A resounding "No" to the proposed I-11 through Avra Valley!

- Please provide comprehensive detailed study, design and planning to protect the fragile desert and wildlife habitat particularly in the Avra Valley Corridor. .
- Please run i-11 on the west side of tucson.
- Seems to me, we should fix our older highways, rather than creating new ones. There's only so much money.
- It can't happen soon enough. You will never get everyone to agree to every thing but take your best shot instead of having more studies.
- I am for improving the freeway/highway system through Tucson to accommodate future growth.
- This road, leads to nowhere..... Don't do it, stop destroying Arizona! Thank you.
- Concerns of it being a corridor for drug traffic to above Wickenburg. Also the I is supposed to stand for Interstate NOT IntraState which it is as designed.
- You must realize that such a corridors will lead to more development i.e. more houses, more businesses, etc. that will further deplete the water in our already drought stricken state.
- Why make a separate freeway in the same area, when you can just expand the current one??
- Rocky Point is rumored to be getting a shipping port since the ports in CA have so many crippling environmental requirements. Coordination should be considered. (should the corridor be along SR 85?) 2. I-10 is already there from Nogales to Casa Grande. 3. Mexico is one of our largest oil suppliers. Where is the pipeline? 4. Is I-11 really needed? Is there a study that shows the need? What we need is high speed rail for people.
- This survey is obscenely biased towards I-11 being a forgone conclusion. We will fight every step of this process to prevent this disgusting plan for endless urban sprawl.
- I-11 is a project that is NOT NECESSARY. 1-10 is capable of accommodating the needs of Tucson for decades to come. The impact on the archaeology, wildlife and environment will be so severe - it is not worth it just to accommodate a little less congestion on 1-10. Think about what you will be destroying of the past that we can never get back.
- As the owner and operator of a vacation rental within the study corridor, I am acutely aware of the need to preserve the peacefulness and beauty of the natural environment in the Avra Valley area. My business has depended on offering a natural desert experience. The location of Saguaro National Park West is dependent on the location -- it is not an "urban" or "suburban" park and should be preserved as it is. A multi-modal path along Sandario Road would destroy the attractiveness of a major tourism site in southern Arizona and the economic disadvantages of that should be considered. The same is true for the popular Arizona Sonora Desert Museum. These attractions depend on the relative tranquility of the area now -- multi-lane highways would be disruptive and destroy the uniqueness of these destinations. Use of the existing transportation corridors is far preferable. And creating passenger rail along the existing corridors would free up highway space for freight.
- I-10 is often congested and needs some sort of relief, whether it is through additional/bigger roadways or other modes of transport.

- Rather than disturb more land, we should make double-decker freeways, IF freeway capacity is expanded
- I think that a rail line should be considered before we build another freeway. Rail would be a much better alternative. Another freeway only encourages people to continue driving cars, and avoids the needed expansion of mass transit in our state (which desperately needs more mass transit options). A rail line between Nogales and Kingman would be the best option. The existing highways in this study area are more than adequate in their own right. If we're expanding and planning for the future, we need to consider alternatives to single vehicle transportation.
- Before we spend money on new corridors, let's spend the money fixing our existing highways and roads before they totally fall apart.
- A bypass around Phoenix for long distance freight and travelers is needed. Also a connection to Phoenix for interstate travel to and from Las Vegas and mountain region.
- Again I say, use the existing road. Don't build a road in sensitive areas.
- I don't see a need for yet another interstate highway in southern Arizona. We already have I-19, I-10, I-8 and highway 85. Just expand and improve those corridors to make through traffic from Nogales to Wickenburg more efficient. That'll be much more cost effective and far less destructive to the Sonoran desert rather than building an entire new interstate highway.
- Thanks for listening.
- Start widening US 93 now. Don't wait for I-11 to be fully completed for use. US 93 is a death trap with many serious accidents I drive this road often and greatly concerned for my safety.
- It's a little annoying that all your meeting times were the same and the presentation all at 4:15pm. Should have provided a range of presentations, and possibly one Saturday meeting. However, great that you are providing the opportunity for on-line comments. Thanks.
- Please be advised that I oppose I-11 in particular it's routing west of the Tucson Mountains in the Avra Valley corridor, due in large part to its adverse affects on wildlife corridors and scenic visits.
- Building I-11 is a 1950s approach to 2016 transportation needs. Rail links from Tucson to Phoenix and Las Vegas are needed more than a four-lane highway.
- I filled out the questionnaire, then went to check the map, came back to the questionnaire and all info was lost. I would have to refill the entire questionnaire again!! Please fix your website.
- Letter previously sent to ADOT, and I appreciate that the map has now been corrected.

## **Verbal Comments (Court Reporter)**

---

ARIZONA DEPARTMENT OF TRANSPORTATION  
INTERSTATE 11 CORRIDOR TIER 1  
ENVIRONMENT IMPACT STATEMENT  
NOGALES TO WICKENBURG

PUBLIC COMMENT

June 8, 2016

4:00 p.m.

Dorothy Powell Senior Adult Center  
405 East 6th Street  
Casa Grande, Arizona 85122

REPORTED BY:

Janice Gonzales, RPR, CRR

AZ Certified Court

Reporter No. 50844

1 (The public comment meeting commenced at 4:00 p.m.)

2 [REDACTED] My name is [REDACTED]  
3 and I'm from the western region where this corridor  
4 is, the Thunderbird Farms area of Maricopa, and we're  
5 here because we want to hopefully keep the freeway  
6 out of our backyard. We understand that there is a  
7 proposed corridor down the 85, and we just want them  
8 to know that we think that makes a lot more sense. A  
9 lot less damage and destruction. It's more cost  
10 effective. Highway already exists and they get the  
11 same end results since this corridor will not be  
12 beneficial to traffic in and out of Maricopa anyways.

13 [REDACTED]: [REDACTED] Colorado River  
14 Indian Tribes. [REDACTED], Tribal  
15 Historical Preservation Office. [REDACTED].  
16 We have a concern about this format because you  
17 didn't say whatever we put in will be brought back to  
18 the public, or that there would be a public document  
19 for people to review. So if we submitted this, how  
20 are we supposed to know it's going to be reflected  
21 back to the community what everybody's concerns were?

22 So in essence, this process stifled the  
23 people to hear other people's concerns, and you  
24 didn't say there was a mechanism for us to see what  
25 everybody else said. He said the EIS will review



1 everybody's comments. This isn't a public comment.  
2 It doesn't meet the public comment scoping meeting.  
3 It bypasses it.

4 So we're supposed to put full faith into  
5 ADOT and the federal highway to get the comments in  
6 and to meet the problems or look at what the problems  
7 are that people have, but transparency doesn't say  
8 we'll all get to see what was said. So that's the  
9 protest.

10 [REDACTED] [REDACTED]  
11 I'm from the Quechan Tribe and [REDACTED]  
12 [REDACTED] cultural committee. And it's just that I  
13 have a lot of questions, a lot of concerns on some of  
14 these -- the corridor because there's a lot of  
15 cultural, you know, materials that are out there --  
16 tribal cultural materials that are out in some of  
17 these areas -- well, most of all these areas that  
18 they're going to be going through, you know.

19 And one of the major corridors is the one  
20 going from Buckeye going north. You know, right in  
21 that whole area, there's some -- some cultural  
22 materials that are on the national register that --  
23 you know, that they're going to be going through.  
24 And even if they narrow it, there's still a lot --  
25 there's a village there. There's a lot of cultural

1 materials that's in that area. And seems like to me  
2 they need to do a complete avoidance of the whole  
3 area because, you know, I think they need to do a  
4 cultural survey study first so that they can identify  
5 all those cultural sites so that they can stay away  
6 from those areas.

7 We're already being impacted by soto  
8 projects as it is right now, you know. We're dealing  
9 with that in the desert and now we're dealing with  
10 this big corridor too. So that kind of wipes away  
11 our, you know, culture materials, and that's really  
12 my concern right there.

13 And I'm not speaking for all the tribes,  
14 but I'm just speaking for my tribe, you know, because  
15 I'm in from the Fort Yuma area which is next to Yuma,  
16 and we come all along up the river too in the Gila  
17 River. So we have a history that we travel from  
18 there all the way up into, you know, Phoenix area,  
19 you know, and there's trails that are out there.

20 I know they mentioned on this a  
21 historical trail, but they never mentioned a  
22 prehistorical trail. That's not mentioned in there.  
23 So there's a lot of, you know, discrepancy I think  
24 still, but I think they need to really sit down at  
25 some point and work with the tribes. You know, it's

1 good for public comments, but I think I don't know  
2 right now if they're planning on doing a government  
3 to government consultation with the tribes. I don't  
4 know if it's an undertaking right now, but if that  
5 ever happens, I think that they need to do that and  
6 there's a concern for that. That's one of the  
7 reasons why we're here, to just hear how it works out  
8 right now -- just to hear where everything's at right  
9 now. Just a scoping meeting.

10 And I'll probably be coming to more of  
11 the meetings, and I know a lot of these other -- the  
12 corridor impacts a lot of reservations, you know,  
13 also and that's one of them.

14 [REDACTED] [REDACTED]  
15 [REDACTED] the Pascua Yaqui Tribe and my  
16 concerns, I don't want to repeat the same thing that  
17 [REDACTED] said. You know, it sounds like pretty much  
18 of what I wanted to say, but it is going to be a big  
19 impact not only, you know, just for -- just for the  
20 Pascua Yaqui Tribe. It's going to be heck for the  
21 other tribal members as well.

22 It's a good thing that we're having this  
23 meeting now. There's not too many tribal members  
24 that are here to support or to -- even give their  
25 comments, but, you know, since we're going to be

1 having more meetings ongoing, you know, hopefully  
2 we'll have more tribal members that will come and  
3 express their concerns of what's going on.

4 I, myself, feel like total avoidance of  
5 it all. That's the way I feel personally. And, you  
6 know, it's -- I have no words. Avoidance of it all.  
7 I mean, that's all I can -- I want to say more, but  
8 it's not going to be anything nice. Where are the  
9 animals -- where are they going to live?

10 [REDACTED]: You know, I was looking at  
11 the City of Eloy proposed map for I-11 and I like  
12 that. And that's from I-10, go west Baumgarten Road,  
13 and go a few miles on Baumgarten and then curve  
14 around and go to I-8 and go west on I-8, and from  
15 there go to 85 and go north on either Highway 85 or  
16 go north on old U.S. 80. I prefer old U.S. 80  
17 because that offers another alternative there. I-85  
18 may be more congested. So if they go on old U.S. 80  
19 and then go north there to Tonopah and then go from  
20 there to Wickenburg.

21 I didn't like the route going north on  
22 Sun Valley Parkway. I want it to be further west  
23 than Sun Valley Parkway because there are several  
24 north/south freeways there, Sun Valley Parkway, then  
25 there's 303 and the 101 which are going north/south.

1 So there is -- there is nothing further west, so we  
2 want something further west to go north/south which  
3 will be in Tonopah, let's say 400 Avenue or  
4 something.

5 (The public comment concluded at 6:30 p.m.)  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

[illegible]

I HEREBY CERTIFY that the foregoing was taken before me, JANICE GONZALES; that all proceedings had upon the taking of said hearing were recorded and taken down by me on a steno machine as backup and thereafter reduced to writing by me; and that the foregoing pages contain full, true, and correct transcript of said record, all done to the best of my skill and ability.

WITNESS my hand this  
21st day of June 2016

Janice E. Gonzales  
Certified Court Reporter No. 50844  
For the State of Arizona

<b>A</b>	2:13	<b>D</b>	foregoing	<b>I</b>
ability 8:11	come 4:16	damage 2:9	8:4,9	I-10 6:12
acting 3:11	6:2	DAVE 2:13	format 2:16	I-11 6:11
ADOT 3:5	coming 5:10	day 8:14	Fort 4:15	I-8 6:14,14
Adult 1:15	commenced	dealing 4:8	freeway 2:5	I-85 6:17
alternative	2:1	4:9	freeways	identify 4:4
6:17	comment 1:10	DEPARTMENT	6:24	impact 1:5
Angela 2:2,2	2:1 3:1,2	1:3	full 3:4 8:9	5:19
animals 6:9	7:5	desert 4:9	further 6:22	impacted 4:7
anyways 2:12	comments 3:1	destruction	7:1,2	impacts 5:12
area 2:4	3:5 5:1,25	2:9	<b>G</b>	Indian 2:14
3:21 4:1,3	committee	director	Gila 4:16	INTERSTATE
4:15,18	3:12	2:14,15	give 5:24	1:4
areas 3:17	community	discrepancy	go 6:12,13	<b>J</b>
3:17 4:6	2:21	4:23	6:14,14,15	Janice 1:23
Arizona 1:3	complete 4:2	document	6:15,16,18	8:5,18
1:17 8:1	concern 2:16	2:18	6:19,19	June 1:11
8:19	4:12 5:6	doing 5:2	7:2	8:14
Avenue 7:3	concerns	Dorothy 1:15	going 2:20	<b>K</b>
avoidance	2:21,23	<b>E</b>	3:18,18,20	keep 2:5
4:2 6:4,6	3:13 5:16	E 8:18	3:20,23,23	KEN 6:10
AZ 1:24	6:3	East 1:16	5:18,20,25	kind 4:10
<b>B</b>	concluded	effective	6:3,8,9,21	know 2:8,20
back 2:17,21	7:5	2:10	6:25	3:15,18,20
backup 8:8	congested	EIS 2:25	Gonzales	3:23 4:3,8
backyard 2:6	6:18	either 6:15	1:23 8:5	4:11,14,18
Baumgarten	consulta...	Eloy 6:11	8:18	4:19,20,23
6:12,13	5:3	ENVIRONMENT	good 5:1,22	4:25 5:1,4
beneficial	contain 8:9	1:5	government	5:11,12,17
2:12	correct 8:10	Ernestina	5:2,3	5:19,25
best 8:11	corridor 1:4	5:14,14	Grande 1:17	6:1,6,10
big 4:10	2:3,7,11	essence 2:22	<b>H</b>	<b>L</b>
5:18	3:14 4:10	everybody	hand 8:13	let's 7:3
brought 2:17	5:12	2:25	happens 5:5	live 6:9
Buckeye 3:20	corridors	everybody's	HARPER 2:13	look 3:6
bypasses 3:3	3:19	2:21 3:1	hear 2:23	looking 6:10
<b>C</b>	cost 2:9	everythi...	5:7,8	lot 2:8,9
Casa 1:17	COUNTY 8:2	5:8	hearing 8:6	3:13,13,14
Center 1:15	Court 1:24	exists 2:10	heck 5:20	3:24,25
Certified	8:19	express 6:3	highway 2:10	4:23 5:11
1:24 8:19	CRR 1:23	<b>F</b>	3:5 6:15	5:12
CERTIFY 8:4	cultural	faith 3:4	historical	<b>M</b>
chairperson	3:12,15,16	Farms 2:4	2:15 4:21	machine 8:7
3:11	3:21,25	federal 3:5	history 4:17	major 3:19
City 6:11	4:4,5	feel 6:4,5	hopefully	
Colorado	culture 4:11	first 4:4	2:5 6:1	
	curve 6:13			

<b>Manfred</b> 3:10 3:10 <b>map</b> 6:11 <b>Maricopa</b> 2:4 2:12 8:2 <b>materials</b> 3:15,16,22 4:1,11 <b>mean</b> 6:7 <b>mechanism</b> 2:24 <b>meet</b> 3:2,6 <b>meeting</b> 2:1 3:2 5:9,23 <b>meetings</b> 5:11 6:1 <b>members</b> 5:21 5:23 6:2 <b>mentioned</b> 4:20,21,22 <b>miles</b> 6:13	<hr/> <b>P</b> <hr/> <b>p.m</b> 1:12 2:1 7:5 <b>pages</b> 8:9 <b>Parkway</b> 6:22 6:23,24 <b>Pascua</b> 5:15 5:20 <b>people</b> 2:19 2:23 3:7 <b>people's</b> 2:23 <b>personally</b> 6:5 <b>Phoenix</b> 4:18 <b>planning</b> 5:2 <b>point</b> 4:25 <b>Powell</b> 1:15 <b>prefer</b> 6:16 <b>prehisto...</b> 4:22 <b>Preserva...</b> 2:15 <b>pretty</b> 5:17 <b>probably</b> 5:10 <b>problems</b> 3:6 3:6 <b>proceedings</b> 8:6 <b>process</b> 2:22 <b>projects</b> 4:8 <b>proposed</b> 2:7 6:11 <b>protest</b> 3:9 <b>public</b> 1:10 2:1,18,18 3:1,2 5:1 7:5 <b>put</b> 2:17 3:4	4:24 <b>reasons</b> 5:7 <b>record</b> 8:10 <b>recorded</b> 8:7 <b>reduced</b> 8:8 <b>reflected</b> 2:20 <b>region</b> 2:3 <b>register</b> 3:22 <b>repeat</b> 5:16 <b>REPORTED</b> 1:22 <b>Reporter</b> 1:25 8:19 <b>reservat...</b> 5:12 <b>results</b> 2:11 <b>review</b> 2:19 2:25 <b>right</b> 3:20 4:8,12 5:2 5:4,8,8 <b>river</b> 2:13 4:16,17 <b>Road</b> 6:12 <b>route</b> 6:21 <b>RPR</b> 1:23	<b>stay</b> 4:5 <b>steno</b> 8:7 <b>stifled</b> 2:22 <b>Street</b> 1:16 <b>study</b> 4:4 <b>submitted</b> 2:19 <b>Sun</b> 6:22,23 6:24 <b>support</b> 5:24 <b>supposed</b> 2:20 3:4 <b>survey</b> 4:4	<b>true</b> 8:9 <hr/> <b>U</b> <hr/> <b>U.S</b> 6:16,16 6:18 <b>understand</b> 2:6 <b>undertaking</b> 5:4 <hr/> <b>V</b> <hr/> <b>Valley</b> 6:22 6:23,24 <b>VERMA</b> 6:10 <b>Villa</b> 2:2,2 <b>village</b> 3:25 <hr/> <b>W</b> <hr/> <b>want</b> 2:5,7 5:16 6:7 6:22 7:2 <b>wanted</b> 5:18 <b>way</b> 4:18 6:5 <b>we'll</b> 3:8 6:2 <b>we're</b> 2:4 3:4 4:7,8 4:9 5:7,22 5:25 <b>west</b> 6:12,14 6:22 7:1,2 <b>western</b> 2:3 <b>Wickenburg</b> 1:6 6:20 <b>wipes</b> 4:10 <b>WITNESS</b> 8:13 <b>words</b> 6:6 <b>work</b> 4:25 <b>works</b> 5:7 <b>writing</b> 8:8
<hr/> <b>N</b> <hr/> <b>name</b> 2:2 3:10 5:14 <b>narrow</b> 3:24 <b>national</b> 3:22 <b>need</b> 4:2,3 4:24 5:5 <b>never</b> 4:21 <b>nice</b> 6:8 <b>NOGALES</b> 1:6 <b>Noriega</b> 5:14 5:15 <b>north</b> 3:20 6:15,16,19 6:21 <b>north/south</b> 6:24,25 7:2	<hr/> <b>Q</b> <hr/> <b>Quechan</b> 3:11 <b>questions</b> 3:13	<hr/> <b>S</b> <hr/> <b>scoping</b> 3:2 5:9 <b>Scott</b> 3:10 3:10 5:17 <b>see</b> 2:24 3:8 <b>Senior</b> 1:15 <b>sense</b> 2:8 <b>sit</b> 4:24 <b>sites</b> 4:5 <b>skill</b> 8:11 <b>soto</b> 4:7 <b>sounds</b> 5:17 <b>speaking</b> 4:13,14 <b>ss</b> 8:1 <b>State</b> 8:1,19 <b>STATEMENT</b> 1:5	<hr/> <b>T</b> <hr/> <b>taken</b> 8:5,7 <b>thing</b> 5:16 5:22 <b>think</b> 2:8 4:3,23,24 5:1,5 <b>THPO</b> 2:14 <b>Thunderbird</b> 2:4 <b>TIER</b> 1:4 <b>Tonopah</b> 6:19 7:3 <b>total</b> 6:4 <b>traffic</b> 2:12 <b>trail</b> 4:21 4:22 <b>trails</b> 4:19 <b>transcript</b> 8:10 <b>transpar...</b> 3:7 <b>TRANSPOR...</b> 1:3 <b>travel</b> 4:17 <b>tribal</b> 2:14 3:16 5:21 5:23 6:2 <b>tribe</b> 3:11 4:14 5:15 5:20 <b>tribes</b> 2:14 4:13,25 5:3	<hr/> <b>X</b> <hr/> <hr/> <b>Y</b> <hr/> <b>Yaqui</b> 5:15 5:20 <b>Yuma</b> 4:15,15
<hr/> <b>O</b> <hr/> <b>offers</b> 6:17 <b>Office</b> 2:15 <b>old</b> 6:16,16 6:18 <b>ongoing</b> 6:1	<hr/> <b>R</b> <hr/> <b>really</b> 4:11			



<b>Z</b>				
<b>0</b>				
<b>1</b>				
1 1:4				
101 6:25				
11 1:4				
<b>2</b>				
2016 1:11				
8:14				
21st 8:14				
<b>3</b>				
303 6:25				
<b>4</b>				
4:00 1:12				
2:1				
400 7:3				
405 1:16				
<b>5</b>				
50844 1:25				
8:19				
<b>6</b>				
6:30 7:5				
6th 1:16				
<b>7</b>				
<b>8</b>				
8 1:11				
80 6:16,16				
6:18				
85 2:7 6:15				
6:15				
85122 1:17				

ARIZONA DEPARTMENT OF TRANSPORTATION  
INTERSTATE 11 CORRIDOR TIER 1  
ENVIRONMENT IMPACT STATEMENT  
NOGALES TO WICKENBURG

PUBLIC COMMENT

June 15, 2016

4:00 p.m.

City of Buckeye Community Center  
201 E. Centre Avenue  
Buckeye, Arizona 85326

REPORTED BY:

Janice Gonzales, RPR, CRR

AZ Certified Court

Reporter No. 50844

1 (The public comment meeting commenced at 4:00 p.m.)

2 [REDACTED] I was just wondering,  
3 because of current events going in the world, if the  
4 military, homeland security, border patrol are  
5 involved in any of this because of the traffic from  
6 Mexico to Canada, and just for homeland security and  
7 also drug transportation between those places, how  
8 involved are they in this project too because they  
9 should be involved. Thank you.

10 [REDACTED]: What is the fact-based  
11 decision-making process for where I-11 will go and  
12 why and what is the economic impact? Because, you  
13 know, it's very easy to just say words in  
14 generalities, but when you have specifics, it's a  
15 whole different story and we as the consuming public  
16 should know in advance. That should be a check and  
17 balance for everyone.

18 [REDACTED] The proposal of the central  
19 plan seems to me the easiest. There's a lot of  
20 federal BLM, Bureau of Land Management. There's huge  
21 areas down there and I live down there. It's a big  
22 flooding zone area as well. Be interesting to see  
23 what proposal they would have to come through there  
24 when all the dips and everything that's out there is  
25 in the BLM. And I think them coming through federal

1 land like that, probably not going to be even  
2 feasible. It's such a huge area. It hasn't been  
3 touched. I've lived there. I'm 57 years old. Fifty  
4 years, nobody has touched that because it is BLM.  
5 Still open range. You still see the cattle because  
6 that's about the only thing that could make it  
7 through there when it floods. I'm just saying it's a  
8 dip. Hopefully that makes sense. I'm just saying  
9 it's a weird place to put it.

10 [REDACTED] Okay. My suggestion is,  
11 rather than buy -- having to buy up farmland north of  
12 the Gila River, why not stay south of the Gila River  
13 where you're not interfering with any private land at  
14 all. And also I think by coming along like that,  
15 that it would help the floodplain. It would act as a  
16 barrier. And because all along the Gila River there,  
17 we really have a problem. The farmers have had a  
18 problem with us being in the floodplain and I think  
19 that that would help.

20 And then my other suggestion is is -- and  
21 this is -- I think that by staying too close to I-8,  
22 that that is such a drug corridor now that I think it  
23 would further impact that and it would increase that.  
24 That's just my opinion. And use as much existing --  
25 example, 85 as possible -- Highway 85.

1                   [REDACTED] I guess I would suggest  
2 preserving the integrity of the old highway, Highway  
3 80, at least just so that there is a way to divert  
4 traffic when there are accidents or other things that  
5 cause backups on the freeway. Because if you take  
6 those out, then, or you break them up with Highway  
7 11, if there's backups, then you're stuck on the  
8 freeway, or things like that, or there's no  
9 alternative route for people to get around. That's  
10 just a thought I had.

11                   (The public comment concluded at 6:30 p.m.)  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

WITNESS my hand this  
21st day of June 2016

Janice E. Gonzales  
Certified Court Reporter No. 50844  
For the State of Arizona

<b>A</b>	<b>check</b> 2:16	<b>events</b> 2:3	<b>homeland</b> 2:4	<b>MARICOPA</b> 5:2
<b>ability</b> 5:11	<b>City</b> 1:15	<b>example</b> 3:25	2:6	<b>McGEE</b> 2:2
<b>accidents</b>	<b>close</b> 3:21	<b>existing</b>	<b>Hopefully</b>	<b>meeting</b> 2:1
4:4	<b>come</b> 2:23	3:24	3:8	<b>Mexico</b> 2:6
<b>act</b> 3:15	<b>coming</b> 2:25	<b>F</b>	<b>huge</b> 2:20	<b>military</b> 2:4
<b>advance</b> 2:16	3:14	<b>fact-based</b>	3:2	<b>N</b>
<b>alternative</b>	<b>commenced</b>	2:10	<b>I</b>	<b>NOGALES</b> 1:6
4:9	2:1	<b>farmers</b> 3:17	<b>I-11</b> 2:11	<b>north</b> 3:11
<b>ANDREW</b> 2:10	<b>comment</b> 1:10	<b>farmland</b>	<b>I-8</b> 3:21	<b>O</b>
<b>ANONYMOUS</b>	2:1 4:11	3:11	<b>impact</b> 1:5	<b>Okay</b> 3:10
2:18	<b>Community</b>	<b>feasible</b> 3:2	2:12 3:23	<b>old</b> 3:3 4:2
<b>area</b> 2:22	1:15	<b>federal</b> 2:20	<b>increase</b>	<b>open</b> 3:5
3:2	<b>concluded</b>	2:25	3:23	<b>opinion</b> 3:24
<b>areas</b> 2:21	4:11	<b>Fifty</b> 3:3	<b>integrity</b>	<b>P</b>
<b>Arizona</b> 1:3	<b>consuming</b>	<b>flooding</b>	4:2	<b>p.m</b> 1:12 2:1
1:17 5:1	2:15	2:22	<b>interesting</b>	4:11
5:19	<b>contain</b> 5:9	<b>floodplain</b>	2:22	<b>pages</b> 5:9
<b>ARNOLD</b> 3:10	<b>correct</b> 5:10	3:15,18	<b>interfering</b>	<b>patrol</b> 2:4
<b>Avenue</b> 1:16	<b>corridor</b> 1:4	<b>floods</b> 3:7	3:13	<b>people</b> 4:9
<b>AZ</b> 1:24	3:22	<b>foregoing</b>	<b>INTERSTATE</b>	<b>place</b> 3:9
<b>B</b>	<b>COUNTY</b> 5:2	5:4,9	1:4	<b>places</b> 2:7
<b>backup</b> 5:8	<b>Court</b> 1:24	<b>freeway</b> 4:5	<b>involved</b> 2:5	<b>plan</b> 2:19
<b>backups</b> 4:5	5:19	4:8	2:8,9	<b>possible</b>
4:7	<b>CRR</b> 1:23	<b>full</b> 5:9	<b>J</b>	3:25
<b>balance</b> 2:17	<b>current</b> 2:3	<b>further</b> 3:23	<b>Janice</b> 1:23	<b>preserving</b>
<b>barrier</b> 3:16	<b>D</b>	<b>G</b>	5:5,18	4:2
<b>best</b> 5:11	<b>day</b> 5:14	<b>generali...</b>	<b>JOEL</b> 4:1	<b>private</b> 3:13
<b>big</b> 2:21	<b>decision...</b>	2:14	<b>JOHN</b> 4:1	<b>probably</b> 3:1
<b>BLM</b> 2:20,25	2:11	<b>GEORGIA</b> 3:10	<b>June</b> 1:11	<b>problem</b> 3:17
3:4	<b>DEPARTMENT</b>	<b>Gila</b> 3:12,12	5:14	3:18
<b>border</b> 2:4	1:3	3:16	<b>K</b>	<b>proceedings</b>
<b>break</b> 4:6	<b>different</b>	<b>GLORIA</b> 2:2	<b>know</b> 2:13,16	5:6
<b>Buckeye</b> 1:15	2:15	<b>go</b> 2:11	<b>L</b>	<b>process</b> 2:11
1:17	<b>dip</b> 3:8	<b>going</b> 2:3	<b>land</b> 2:20	<b>project</b> 2:8
<b>Bureau</b> 2:20	<b>dips</b> 2:24	3:1	3:1,13	<b>proposal</b>
<b>buy</b> 3:11,11	<b>divert</b> 4:3	<b>Gonzales</b>	<b>LEHMAN</b> 2:10	2:18,23
<b>C</b>	<b>drug</b> 2:7	1:23 5:5	<b>live</b> 2:21	<b>public</b> 1:10
<b>Canada</b> 2:6	3:22	5:18	<b>lived</b> 3:3	2:1,15
<b>cattle</b> 3:5	<b>E</b>	<b>guess</b> 4:1	<b>lot</b> 2:19	4:11
<b>cause</b> 4:5	<b>E1</b> 1:16 5:18	<b>H</b>	<b>M</b>	<b>put</b> 3:9
<b>Center</b> 1:15	<b>easiest</b> 2:19	<b>hand</b> 5:13	<b>machine</b> 5:7	<b>Q</b>
<b>central</b> 2:18	<b>easy</b> 2:13	<b>hearing</b> 5:6	<b>Management</b>	<b>R</b>
<b>Centre</b> 1:16	<b>economic</b>	<b>help</b> 3:15,19	2:20	<b>range</b> 3:5
<b>Certified</b>	2:12	<b>highway</b> 3:25		
1:24 5:19	<b>ENVIRONMENT</b>	4:2,2,6		
<b>CERTIFY</b> 5:4	1:5			

<b>really</b> 3:17	3:4	<b>4</b>		
<b>record</b> 5:10	<b>traffic</b> 2:5	<b>4:00</b> 1:12		
<b>recorded</b> 5:7	4:4	2:1		
<b>reduced</b> 5:8	<b>transcript</b>			
<b>REPORTED</b>	5:10	<b>5</b>		
1:22	<b>transpor...</b>	<b>50844</b> 1:25		
<b>Reporter</b>	1:3 2:7	5:19		
1:25 5:19	<b>true</b> 5:9	<b>57</b> 3:3		
<b>River</b> 3:12				
3:12,16	<b>U</b>	<b>6</b>		
<b>route</b> 4:9	<b>use</b> 3:24	<b>6:30</b> 4:11		
<b>RPR</b> 1:23				
	<b>V</b>	<b>7</b>		
<b>S</b>				
<b>saying</b> 3:7,8	<b>W</b>	<b>8</b>		
<b>security</b> 2:4	<b>way</b> 4:3	<b>80</b> 4:3		
2:6	<b>weird</b> 3:9	<b>85</b> 3:25,25		
<b>see</b> 2:22 3:5	<b>WICKENBURG</b>	<b>85326</b> 1:17		
<b>sense</b> 3:8	1:6			
<b>skill</b> 5:11	<b>WITNESS</b> 5:13			
<b>south</b> 3:12	<b>wondering</b>			
<b>specifics</b>	2:2			
2:14	<b>words</b> 2:13			
<b>ss</b> 5:1	<b>world</b> 2:3			
<b>State</b> 5:1,19	<b>writing</b> 5:8			
<b>STATEMENT</b>				
1:5	<b>X</b>			
<b>stay</b> 3:12				
<b>staying</b> 3:21	<b>Y</b>			
<b>steno</b> 5:7	<b>years</b> 3:3,4			
<b>story</b> 2:15				
<b>stuck</b> 4:7	<b>Z</b>			
<b>suggest</b> 4:1	<b>zone</b> 2:22			
<b>suggestion</b>				
3:10,20	<b>0</b>			
<b>T</b>	<b>1</b>			
<b>take</b> 4:5	<b>1</b> 1:4			
<b>taken</b> 5:5,7	<b>11</b> 1:4 4:7			
<b>Thank</b> 2:9	<b>15</b> 1:11			
<b>thing</b> 3:6				
<b>things</b> 4:4,8	<b>2</b>			
<b>think</b> 2:25	<b>201</b> 1:16			
3:14,18,21	<b>2016</b> 1:11			
3:22	5:14			
<b>thought</b> 4:10	<b>21st</b> 5:14			
<b>TIER</b> 1:4				
<b>touched</b> 3:3	<b>3</b>			



1

2

3

4

5

Interstate 11 Tier 1 Environmental Impact Statement

6

Public Scoping Meeting

7

Public Comments

8

9

10

Tuesday, June 21, 2016

11

Nogales, Arizona

12

13

14

15

16

17

18

19

Transcript Prepared by Kimberley W. Gauthier

20

Certified Court Reporter No. 50767

21

Colville & Associates

22

1309 E. Broadway

23

Tucson, AZ 85719-5824

24

(520) 884-9041 FAX (520) 623-1681

25

Reporter Agency Firm No. R1032

1 The following comments were made for the record by  
2 members of the public:

3 [REDACTED] from  
4 Rio Rico, Arizona:

5 My suggestion would be to completely  
6 avoid the Coronado National Forest for any potential  
7 future Interstate 11. I think the most economical  
8 alternative would be to widen and improve existing  
9 Interstate 19. I have seen an ADOT proposal for this  
10 flyover freeway merging -- like an overhead bridge  
11 from the Mariposa port of entry on Highway 189 as a  
12 direct access on I-19. That's where all the traffic  
13 congestion occurs there on Mariposa. Thank you.

14  
15 [REDACTED] Nogales, Arizona:

16 Federal Highway 89 was originally put  
17 in from Nogales to Canada as a north-south corridor.  
18 So here we go again. And over the years, Highway 89  
19 has been disassembled and integrated into interstate  
20 systems, so nowadays it's hard to find that highway on  
21 a map. I'm just curious why the main routing is going  
22 through Wickenburg and the Hoover Dam area and such,  
23 and I'd like to know what the motivation is. Is the  
24 trucking industry behind that? That's kind of the  
25 generalized comment.

1 But the other comment that I'd like to  
2 make that has some emphasis is that State Highway 82  
3 is heavily used by commercial traffic, and it's a  
4 two-lane road. My opinion is that it's not adequate  
5 for the kind of service it's being subjected to.  
6 Accidents are frequent and local people so far have  
7 been lucky, but we are subjected to a lot of hazards.  
8 That's the only comment I have. If this Interstate 11  
9 could be somehow accessed from Nogales to divert more  
10 commercial traffic into it, rather than Highway 82,  
11 Highway 83, Highway 90 network, I think that would be  
12 a big plus for us. End of quote.

13  
14 [REDACTED] Tubac, Arizona:

15 I think that I-19 should be expanded by  
16 two lanes to accommodate I-11, and to be doubled back  
17 at I-10 through Tucson. And I have a question: and  
18 that is, is Mexico doing anything corresponding to our  
19 -- from Guaymas on Highway 15 to Nogales?

20  
21 [REDACTED] Tubac, Arizona:

22 I think the timing on the scoping  
23 sessions is not the best because there are so many  
24 people that are not residents -- that are here only in  
25 the winter and they're gone. Many of the permanent

1 residents are gone on vacation, and it just isn't  
2 getting the word out. And it makes you -- it makes it  
3 look not quite aboveboard. It makes it look like  
4 they're trying to sneak something through.

5 (Comments concluded at 5:45 p.m.)  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 State of Arizona           )  
  ) ss.  
2 County of Pima           )

3           Be it known that the foregoing comments were taken  
4 before me; that the foregoing pages are a full, true and  
5 accurate record of the proceedings, all done to the best of  
6 my skill and ability; that the proceedings were taken down  
7 by me in shorthand and thereafter reduced to print under my  
8 direction.

9

10

11

12

13

14

---

Kimberley W. Gauthier, RPR  
Certified Reporter  
Arizona CR No. 50767

15

16

17

18

19

20

21

22

23

24

25

**WORD INDEX****< 1 >**

**1** 1:5  
**11** 1:5 2:7 3:8  
**1309** 1:22  
**15** 3:19  
**189** 2:11  
**19** 2:9

**< 2 >**

**2016** 1:10  
**21** 1:10

**< 5 >**

**5:45** 4:5  
**50767** 1:20 5:15  
**520** 1:24, 24

**< 6 >**

**623-1681** 1:24

**< 8 >**

**82** 3:2, 10  
**83** 3:11  
**85719-5824** 1:23  
**884-9041** 1:24  
**89** 2:16, 18

**< 9 >**

**90** 3:11

**< A >**

**ability** 5:6  
**aboveboard** 4:3  
**access** 2:12  
**accessed** 3:9  
**Accidents** 3:6  
**accommodate** 3:16  
**accurate** 5:5  
**adequate** 3:4  
**ADOT** 2:9  
**Agency** 1:25  
**alternative** 2:8  
**area** 2:22  
**Arizona** 1:11 2:4, 15 3:14, 21 5:1, 15  
**Associates** 1:21  
**avoid** 2:6  
**AZ** 1:23

**< B >**

**back** 3:16  
**best** 3:23 5:5  
**big** 3:12  
**bridge** 2:10  
**Broadway** 1:22

**< C >**

**Canada** 2:17  
**Certified** 1:20 5:14  
**Colville** 1:21  
**comment** 2:25 3:1, 8  
**Comments** 1:7 2:1 4:5 5:3  
**commercial** 3:3, 10  
**completely** 2:5

**concluded** 4:5  
**congestion** 2:13  
**Coronado** 2:6  
**corresponding** 3:18  
**corridor** 2:17  
**County** 5:2  
**Court** 1:20  
**CR** 5:15  
**curious** 2:21

**< D >**

**Dam** 2:22  
**desert** 2:3  
**direct** 2:12  
**direction** 5:8  
**disassembled** 2:19  
**divert** 3:9  
**doing** 3:18  
**doubled** 3:16  
**Dvorak** 2:15  
**Dwight** 2:3

**< E >**

**economical** 2:7  
**Ed** 2:15  
**emphasis** 3:2  
**entry** 2:11  
**Environmental** 1:5  
**existing** 2:8  
**expanded** 3:15

**< F >**

**far** 3:6  
**FAX** 1:24  
**Federal** 2:16  
**find** 2:20  
**Firm** 1:25  
**flyover** 2:10  
**following** 2:1  
**foregoing** 5:3, 4  
**Forest** 2:6  
**freeway** 2:10  
**frequent** 3:6  
**full** 5:4  
**future** 2:7

**< G >**

**Gauthier** 1:19 5:14  
**generalized** 2:25  
**getting** 4:2  
**go** 2:18  
**going** 2:21  
**Guaymas** 3:19

**< H >**

**hard** 2:20  
**hazards** 3:7  
**heavily** 3:3  
**Highway** 2:11, 16, 18, 20 3:2, 10, 11, 11, 19  
**Hoover** 2:22  
**Howard** 3:14  
**howlambert@gmail.com** 3:14

**< I >**

**I-10** 3:17  
**I-11** 3:16

**I-19** 2:12 3:15  
**Impact** 1:5  
**improve** 2:8  
**industry** 2:24  
**integrated** 2:19  
**Interstate** 1:5 2:7, 9, 19 3:8

**< J >**

**June** 1:10

**< K >**

**Kimberley** 1:19 5:14  
**kind** 2:24 3:5  
**know** 2:23  
**known** 5:3

**< L >**

**Lambert** 3:14, 21  
**lanes** 3:16  
**local** 3:6  
**look** 4:3, 3  
**lot** 3:7  
**lucky** 3:7

**< M >**

**main** 2:21  
**map** 2:21  
**Mariposa** 2:11, 13  
**Meeting** 1:6  
**members** 2:2  
**merging** 2:10  
**Mexico** 3:18  
**mojave** 2:3  
**motivation** 2:23

**< N >**

**National** 2:6  
**network** 3:11  
**Nogales** 1:11 2:15, 17 3:9, 19  
**north-south** 2:17  
**nowadays** 2:20

**< O >**

**occurs** 2:13  
**opinion** 3:4  
**originally** 2:16  
**overhead** 2:10

**< P >**

**p.m** 4:5  
**pages** 5:4  
**Pam** 3:21  
**people** 3:6, 24  
**permanent** 3:25  
**Pima** 5:2  
**plus** 3:12  
**port** 2:11  
**potential** 2:6  
**Prepared** 1:19  
**print** 5:7  
**proceedings** 5:5, 6  
**proposal** 2:9  
**Public** 1:6, 7 2:2  
**put** 2:16

**< Q >**

**question** 3:17  
**quite** 4:3

**quote** 3:12

**< R >**

**R1032** 1:25  
**rat@hotmail.com** 2:3  
**record** 2:1 5:5  
**reduced** 5:7  
**Reporter** 1:20, 25 5:14  
**residents** 3:24 4:1  
**Rico** 2:4  
**Rio** 2:4  
**road** 3:4  
**routing** 2:21  
**RPR** 5:14

**< S >**

**Scoping** 1:6 3:22  
**seen** 2:9  
**service** 3:5  
**sessions** 3:23  
**shorthand** 5:7  
**skill** 5:6  
**sneak** 4:4  
**ss** 5:1  
**State** 3:2 5:1  
**Statement** 1:5  
**subjected** 3:5, 7  
**suggestion** 2:5  
**systems** 2:20

**< T >**

**taken** 5:3, 6  
**Thank** 2:13  
**Thibodeaux** 2:3  
**think** 2:7 3:11, 15, 22  
**Tier** 1:5  
**timing** 3:22  
**traffic** 2:12 3:3, 10  
**Transcript** 1:19  
**trucking** 2:24  
**true** 5:4  
**trying** 4:4  
**Tubac** 3:14, 21  
**Tucson** 1:23 3:17  
**Tuesday** 1:10  
**two** 3:16  
**two-lane** 3:4

**< V >**

**vacation** 4:1

**< W >**

**Wickenburg** 2:22  
**widen** 2:8  
**winter** 3:25  
**word** 4:2

**< Y >**

**years** 2:18

1

2

3

4

5

Interstate 11 Tier 1 Environmental Impact Statement

6

Public Scoping Meeting

7

Public Comments

8

9

10

Wednesday, June 22, 2016

11

Tucson, Arizona

12

13

14

15

16

17

18

19

Transcript Prepared by Kimberley W. Gauthier

20

Certified Court Reporter No. 50767

21

Colville & Associates

22

1309 E. Broadway

23

Tucson, AZ 85719-5824

24

(520) 884-9041 FAX (520) 623-1681

25

Reporter Agency Firm No. R1032

1 The following comments were made for the record by  
2 members of the public:

3 [REDACTED] Tucson, Arizona:

4 How can this still be in the planning  
5 stages when we had a bond issue to do the Sonoran  
6 corridor back in November that is a part of this whole  
7 project? And it's very specific. It does benefit Don  
8 Diamond and Diamond Ventures and their three square  
9 miles of residential property, their land south of  
10 that area. The Old Vail Road connecting to that -- I  
11 believe it's called the Navajo interchange -- at I-19  
12 down to Nogales would be far more logical, as a  
13 straight-line road, rather than one that circles  
14 around his land and benefits him.

15 I've been told by a candidate for the  
16 Count Board of Supervisors -- [REDACTED], I  
17 believe his name is -- that [REDACTED] is asking ten  
18 times more for the land for that road than what he  
19 paid for it, and it will benefit his property.  
20 There's no problem with -- if he will pay the  
21 additional increased value to the land of that  
22 roadway, fine, and the rest we pay for. But for us to  
23 just pay for [REDACTED] benefits doesn't sound good.

24 Another element is the Sandario Road  
25 has long been planned as a bypass, or a connection,



1 out there in Avra Valley, from Marana down to the Ryan  
2 field area. That road, plus the San Joaquin Road,  
3 could easily connect to the Old Vail Road with only  
4 about a three-to-four mile extension. That is a much  
5 cheaper route. It is a good bypass for trucks, and  
6 other -- accidents occur on the main interstate and  
7 Tucson has no bypass, unlike almost all other cities  
8 in this country.

9 That and the fact that they complain  
10 about the environment; true, but it's better to  
11 populate that valley that has huge empty spaces for  
12 recharge of water by Tucson Water, abandoned farmland  
13 that Tucson Water bought, and the dust that floats  
14 over the Picacho Peak area due to those abandoned  
15 farmlands. Better to put housing there and develop it  
16 than to do it in the foothills that are a more  
17 environmentally sensitive area.

18  
19

20

21 the National Optical Astronomy Observatory, NOAO. We  
22 are a federally funded research and development  
23 center, with our headquarters here on the campus of  
24 the University of Arizona. Locally, we are most known  
25 for the fact that we are the organization that

1 operates the Kitt Peak national observatory here in  
2 southern Arizona.

3 So our mission, as an organization, is  
4 to build and operate world class telescopes,  
5 scientific instruments and data systems on behalf of  
6 the U.S. astronomical and astrophysical research  
7 community. I'm here today on behalf of the  
8 professional research observatories throughout  
9 Arizona, but particularly in southern Arizona.

10 And to keep this brief, we're very  
11 interested in working with the study team and the  
12 design team, in particular in the area of lighting.  
13 There is over a billion dollars in capital investment  
14 in astronomical research facilities here in Arizona,  
15 over 500 million just in the last year alone. We  
16 directly employ roughly 3,000 people, which -- with a  
17 much more -- much larger derived economic impact from  
18 the state.

19 Since we are nighttime observatories,  
20 we're interested in nighttime light. So in  
21 particular, we're really interested in highway lights  
22 and their so-called spectral output. In particular,  
23 we want blue light blocked, low correlated color  
24 temperatures and employment of narrow band amber at  
25 the closest approach to high mountain observatories.

1 ADOT has, in the past, been a great  
2 partner and has exerted special care in replacement  
3 and upgrade of highway lighting in southern Arizona,  
4 which we're really grateful for. And we just want to  
5 encourage continued good lighting design, including  
6 deployment of light fixtures only at major  
7 intersections, and minimal illumination inquired to  
8 meet safety standards, and motion-activated systems  
9 for low-traffic, late-time hours.

10 And to sort of nail that down, design  
11 requirements should be -- at a minimum, adhere to  
12 existing local codes, which here in southern Arizona,  
13 are actually much stronger than they are at the  
14 statewide level because of our long-term involvement  
15 with local governments.

16 So again, we're here to work with the  
17 EIS study team and with the design team. We will  
18 submit a written statement during the comment period  
19 and you know, looking forward that I or one of my  
20 colleagues has a chance to work with this team in the  
21 future. That's basically what I wanted to get on the  
22 record today. Thank you, ma'am.

23

24 [REDACTED] Tucson, Arizona:

25 I'm really angry about the fact that

1 they split this up to the different groups here,  
2 instead of having the Q and A afterwards for the whole  
3 group, because it isolates the individual groups and  
4 then it also discourages communication between the  
5 groups, and ideas and contact with individuals in the  
6 different groups. So I'm very angry about that and  
7 I'm very disappointed with that.

8 I think they should open it up again to  
9 whole Q and A, because people may get ideas from other  
10 people, or they might want to contact other groups,  
11 and you know, you don't to get other people's ideas.  
12 That's basically it. So I mean, I'm very upset about  
13 it. I personally feel that it was intentional because  
14 they don't want people commenting, and that's really  
15 not a way for government to be working. This is  
16 supposed to be an open public meeting. So I just  
17 wanted to put that on the record.

18

19

20 I have visited all 50 states, and in  
21 the eastern part of the country, on their freeways  
22 they have dedicated lanes just for trucks. That way,  
23 they do not pollute and stretch this all over the  
24 state. This proposal is going to ruin a lot of our  
25 prime beautiful desert, right through and by the

1 national parks, etc. It's crazy. They just need to  
2 widen what we've got and dedicate two lanes only for  
3 through traffic or for the trucks.

4

5 [REDACTED] Robles Junction, Arizona:

6 I have some comments that I think that  
7 they should consider. This is specifically around the  
8 Sahuarita mountain area, where they're wanting to go  
9 through, which is where I live. There are a lot of  
10 wild animals up in that area. I could name them, but  
11 I'll spare you. They would need to have some kind of  
12 barrier if they're going to go through that mountain  
13 area, so that those animals don't get on the freeway,  
14 or whatever it is. I'm assuming it's a freeway  
15 because it has interstate.

16 Also, that's cattle land out there, and  
17 they need to consider how the cattlemen are going to  
18 get access to their land. I'm sure they're leasing  
19 state land up there. And if that's going to hinder  
20 their operation, then we'd be losing money from our  
21 schools too, because that's state land trust. If  
22 they're not going to lease it anymore, then we're  
23 going to be hurting in another area.

24 Those guys, they transfer their animals  
25 from different pastures. So how are they going to --

1     how is the I-11 going to accommodate them to get from  
2     one location to another, especially in roundup time as  
3     well.

4                     Also, that area is -- it's state  
5     hunting area 36A, and we get a lot of hunters up there  
6     during hunting season. How will that affect the  
7     hunting up there? Because a lot of people come up  
8     there to hunt for their food. And I don't know how  
9     that will affect the animals if they're going through  
10    there, and also hunting access.

11                    Also, it's a low-light direct because  
12    of Kitt Peak. If you put a lighted highway through  
13    there, I would imagine that Kitt Peak would have a  
14    problem with that. They wouldn't be able to see their  
15    stars as well as they do, and they've been there for  
16    years and year and years, and they should be  
17    accommodated.

18                    If we haven't defined a reason, a need  
19    for I-11; if we're still defining a need, then why are  
20    we even talking about the project? My other -- I  
21    guess I have a comment, does it have to go through  
22    Nogales? Is that something set in stone? Couldn't  
23    they run down -- I know this is out of the area -- but  
24    85? You're already talking about 85 anyhow, up in  
25    Goodyear, and 85 already is a highway that runs down

1 to the border. Why couldn't you just improve that? I  
2 know it's Indian land and a military base, and I think  
3 there's an Organ Pipe National Monument through there.  
4 Why couldn't you just improve what's already there? I  
5 guess that's all the comments I have.

6

7 [REDACTED] Tubac,  
8 Arizona:

9 So the thoughts I have are concerning  
10 the portion from Green Valley south to Nogales. I  
11 think the corridor should remain as close as possible  
12 to the existing I-19 corridor, and not -- possibly go  
13 a couple of miles from I-19, but not much farther than  
14 that. And not disturb the natural areas which are  
15 represented on the limits of the study area. Some of  
16 them are on the other side of the Tumacacori  
17 mountains, so to not build a highway in that area, and  
18 also going east toward the Catalina mountains -- the  
19 Santa Rita mountains, excuse me -- to not build a  
20 highway close to those mountains either.

21 But to keep the industrial nature of a  
22 highway like this close to the existing sort of  
23 degraded situation, which is I-19 as it is right now,  
24 and just keep degradation close to degradation and not  
25 disturb currently very pristine areas, which will be

1 really missed if they're gone.

2 I guess that's about it. We need to  
3 take a look at whether the model, which was created by  
4 Eisenhower in the 1950s to build interstate highways,  
5 is still a good model for the next 100 years. And  
6 with climate change, increasing population, we may  
7 need to think that this model is not realistic 75  
8 years from now.

9 (Comments concluded at 6:25 p.m.)

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25



1 State of Arizona           )  
  ) ss.  
2 County of Pima           )

3           Be it known that the foregoing comments were taken  
4 before me; that the foregoing pages are a full, true and  
5 accurate record of the proceedings, all done to the best of  
6 my skill and ability; that the proceedings were taken down  
7 by me in shorthand and thereafter reduced to print under my  
8 direction.

9

10

11

12

13

14

---

Kimberley W. Gauthier, RPR  
Certified Reporter  
Arizona CR No. 50767

15

16

17

18

19

20

21

22

23

24

25

**WORD INDEX****< 1 >**

1 1:5  
100 10:5  
11 1:5  
1309 1:22  
1950s 10:4

**< 2 >**

2016 1:10  
22 1:10

**< 3 >**

3,000 4:16  
36A 8:5

**< 5 >**

50 6:20  
500 4:15  
50767 1:20 11:15  
520 1:24, 24

**< 6 >**

6:25 10:9  
623-1681 1:24

**< 7 >**

75 10:7

**< 8 >**

85 8:24, 24, 25  
85719-5824 1:23  
884-9041 1:24

**< A >**

abandoned 3:12, 14  
ability 11:6  
able 8:14  
access 7:18 8:10  
accidents 3:6  
accommodate 8:1  
accommodated 8:17  
accurate 11:5  
additional 2:21  
adhere 5:11  
ADOT 5:1  
affect 8:6, 9  
Agency 1:25  
amber 4:24  
angry 5:25 6:6  
animals 7:10, 13, 24 8:9  
Anonymous 6:19  
anymore 7:22  
approach 4:25  
area 2:10 3:2, 14, 17 4:12 7:8, 10, 13, 23 8:4, 5, 23 9:15, 17  
areas 9:14, 25  
Arizona 1:11 2:3 3:24 4:2, 9, 14 5:3, 12, 24 7:5 9:8 11:1, 15  
asking 2:17  
Associates 1:21  
assuming 7:14  
astronomical 4:6,

14

Astronomy 3:21  
astrophysical 4:6  
Avra 3:1  
AZ 1:23

**< B >**

back 2:6  
band 4:24  
Barbara 5:24  
barrier 7:12  
base 9:2  
basically 5:21 6:12  
Basye 2:3  
bay 2:20  
beautiful 6:25  
behalf 4:5, 7  
believe 2:11, 17  
benefit 2:7, 19  
benefits 2:14, 23  
best 11:5  
better 3:10, 15  
billion 4:13  
Blackwell 9:7  
blocked 4:23  
blue 4:23  
Board 2:16  
bond 2:5  
border 9:1  
bought 3:13  
brief 4:10  
Broadway 1:22  
build 4:4 9:17, 19 10:4  
bypass 2:25 3:5, 7

**< C >**

Cain 5:24  
called 2:11  
campus 3:23  
candidate 2:15  
capital 4:13  
care 5:2  
Catalina 9:18  
cattle 7:16  
cattlemen 7:17  
center 3:23  
Certified 1:20 11:14  
chance 5:20  
change 10:6  
cheaper 3:5  
circles 2:13  
cities 3:7  
class 4:4  
climate 10:6  
close 9:11, 20, 22, 24  
closest 4:25  
codes 5:12  
colleagues 5:20  
color 4:23  
Colville 1:21  
come 8:7  
comment 5:18 8:21  
commenting 6:14  
Comments 1:7 2:1 7:6 9:5 10:9 11:3

**communication**

6:4  
community 4:7  
complain 3:9  
concerning 9:9  
concluded 10:9  
connect 3:3  
connecting 2:10  
connection 2:25  
consider 7:7, 17  
contact 6:5, 10  
continued 5:5  
correlated 4:23  
corridor 2:6 9:11, 12  
Count 2:16  
country 3:8 6:21  
County 11:2  
couple 9:13  
Court 1:20  
CR 11:15  
crazy 7:1  
created 10:3  
currently 9:25

**< D >**

data 4:5  
David 2:3 3:19, 20  
dedicate 7:2  
dedicated 6:22  
defined 8:18  
defining 8:19  
degradation 9:24, 24  
degraded 9:23  
deployment 5:6  
derived 4:17  
desert 6:25  
design 4:12 5:5, 10, 17  
develop 3:15  
development 3:22  
Diamond 2:8, 8, 17  
Diamond's 2:23  
different 6:1, 6 7:25  
direct 8:11  
direction 11:8  
directly 4:16  
director 3:20  
disappointed 6:7  
discourages 6:4  
disturb 9:14, 25  
dollars 4:13  
Don 2:7, 17  
due 3:14  
dust 3:13

**< E >**

easily 3:3  
east 9:18  
eastern 6:21  
economic 4:17  
EIS 5:17  
Eisenhower 10:4  
either 9:20  
element 2:24  
employ 4:16  
employment 4:24  
empty 3:11

encourage 5:5  
environment 3:10  
Environmental 1:5  
environmentally 3:17  
especially 8:2  
excuse 9:19  
exerted 5:2  
existing 5:12 9:12, 22  
extension 3:4

**< F >**

facilities 4:14  
fact 3:9, 25 5:25  
far 2:12  
farmland 3:12  
farmlands 3:15  
farther 9:13  
FAX 1:24  
federally 3:22  
feel 6:13  
field 3:2  
fine 2:22  
Firm 1:25  
fixtures 5:6  
floats 3:13  
following 2:1  
food 8:8  
foothills 3:16  
foregoing 11:3, 4  
forward 5:19  
freeway 7:13, 14  
freeways 6:21  
full 11:4  
funded 3:22  
future 5:21

**< G >**

Gauthier 1:19 11:14  
go 7:8, 12 8:21 9:12  
going 6:24 7:12, 17, 19, 22, 23, 25 8:1, 9 9:18  
good 2:23 3:5 5:5 10:5  
Goodyear 8:25  
government 6:15  
governments 5:15  
grateful 5:4  
great 5:1  
Green 9:10  
group 6:3  
groups 6:1, 3, 5, 6, 10  
guess 8:21 9:5 10:2  
guys 7:24

**< H >**

headquarters 3:23  
Hernandez 2:16  
high 4:25  
highway 4:21 5:3 8:12, 25 9:17, 20, 22  
highways 10:4  
hinder 7:19  
hours 5:9

housing 3:15  
huge 3:11  
hunt 8:8  
hunters 8:5  
hunting 8:5, 6, 7, 10  
hurting 7:23

**< I >**

I-11 8:1, 19  
I-19 2:11 9:12, 13, 23  
ideas 6:5, 9, 11  
illumination 5:7  
imagine 8:13  
Impact 1:5 4:17  
improve 9:1, 4  
including 5:5  
increased 2:21  
increasing 10:6  
Indian 9:2  
individual 6:3  
individuals 6:5  
industrial 9:21  
inquired 5:7  
instruments 4:5  
intentional 6:13  
interchange 2:11  
interested 4:11, 20, 21  
intersections 5:7  
Interstate 1:5 3:6 7:15 10:4  
investment 4:13  
involvement 5:14  
isolates 6:3  
issue 2:5

**< J >**

Joaquin 3:2  
Junction 7:5  
June 1:10

**< K >**

Karen 7:5  
keep 4:10 9:21, 24  
Kimberley 1:19 11:14  
kind 7:11  
Kitt 4:1 8:12, 13  
know 5:19 6:11 8:8, 23 9:2  
known 3:24 11:3

**< L >**

land 2:9, 14, 18, 21 7:16, 18, 19, 21 9:2  
lanes 6:22 7:2  
larger 4:17  
late-time 5:9  
lease 7:22  
leasing 7:18  
Lee 9:7  
leeblackwell777@gmail.com 9:7  
level 5:14  
light 4:20, 23 5:6  
lighted 8:12  
lighting 4:12 5:3,

<p>5 lights 4:21 limits 9:15 live 7:9 local 5:12, 15 Locally 3:24 location 8:2 logical 2:12 long 2:25 long-term 5:14 look 10:3 looking 5:19 losing 7:20 lot 6:24 7:9 8:5, 7 low 4:23 low-light 8:11 low-traffic 5:9</p> <p>&lt; M &gt; ma'am 5:22 main 3:6 major 5:6 Marana 3:1 mean 6:12 meet 5:8 Meeting 1:6 6:16 members 2:2 mile 3:4 miles 2:9 9:13 military 9:2 million 4:15 minimal 5:7 minimum 5:11 missed 10:1 mission 4:3 model 10:3, 5, 7 money 7:20 Monument 9:3 motion-activated 5:8 mountain 4:25 7:8, 12 mountains 9:17, 18, 19, 20</p> <p>&lt; N &gt; nail 5:10 name 2:17 7:10 narrow 4:24 National 3:21 4:1 7:1 9:3 natural 9:14 nature 9:21 Navajo 2:11 need 7:1, 11, 17 8:18, 19 10:2, 7 nighttime 4:19, 20 NOAO 3:21 Nogales 2:12 8:22 9:10 November 2:6</p> <p>&lt; O &gt; observatories 4:8, 19, 25 Observatory 3:21 4:1 occur 3:6 Old 2:10 3:3 open 6:8, 16</p>	<p>operate 4:4 operates 4:1 operation 7:20 Optical 3:21 Organ 9:3 organization 3:25 4:3 output 4:22</p> <p>&lt; P &gt; p.m 10:9 pages 11:4 paid 2:19 parks 7:1 part 2:6 6:21 particular 4:12, 21, 22 particularly 4:9 partner 5:2 pastures 7:25 pay 2:22, 23 Peak 3:14 4:1 8:12, 13 people 4:16 6:9, 10, 14 8:7 people's 6:11 period 5:18 personally 6:13 Picacho 3:14 Pima 11:2 Pipe 9:3 planned 2:25 planning 2:4 plus 3:2 pollute 6:23 populate 3:11 population 10:6 portion 9:10 possible 9:11 possibly 9:12 Potter 7:5 Prepared 1:19 prime 6:25 print 11:7 pristine 9:25 problem 2:20 8:14 proceedings 11:5, 6 professional 4:8 project 2:7 8:20 property 2:9, 19 proposal 6:24 Public 1:6, 7 2:2 6:16 put 3:15 6:17 8:12</p> <p>&lt; R &gt; R1032 1:25 realistic 10:7 really 4:21 5:4, 25 6:14 10:1 reason 8:18 recharge 3:12 record 2:1 5:22 6:17 11:5 reduced 11:7 remain 9:11 replacement 5:2 Reporter 1:20, 25</p>	<p>11:14 represented 9:15 requirements 5:11 research 3:22 4:6, 8, 14 residential 2:9 rest 2:22 Richard 2:16 right 6:25 9:23 Rita 9:19 Road 2:10, 13, 18, 24 3:2, 2, 3 roadway 2:22 Robles 7:5 roughly 4:16 roundup 8:2 route 3:5 RPR 11:14 ruin 6:24 run 8:23 runs 8:25 Ryan 3:1</p> <p>&lt; S &gt; safety 5:8 Sahuarita 7:8 San 3:2 Sandario 2:24 Santa 9:19 schools 7:21 scientific 4:5 Scoping 1:6 season 8:6 see 8:14 sensitive 3:17 set 8:22 shorthand 11:7 side 9:16 Silva 3:19, 20 situation 9:23 skill 11:6 so-called 4:22 Sonoran 2:5 sort 5:10 9:22 sound 2:23 south 2:9 9:10 southern 4:2, 9 5:3, 12 spaces 3:11 spare 7:11 special 5:2 specific 2:7 specifically 7:7 spectral 4:22 split 6:1 square 2:8 ss 11:1 stages 2:5 standards 5:8 stars 8:15 state 4:18 6:24 7:19, 21 8:4 11:1 Statement 1:5 5:18 states 6:20 statewide 5:14 stone 8:22 straight-line 2:13 stretch 6:23 stronger 5:13 study 4:11 5:17</p>	<p>9:15 submit 5:18 Supervisors 2:16 supposed 6:16 sure 7:18 systems 4:5 5:8</p> <p>&lt; T &gt; take 10:3 taken 11:3, 6 talking 8:20, 24 team 4:11, 12 5:17, 17, 20 telescopes 4:4 temperatures 4:24 ten 2:17 Thank 5:22 think 6:8 7:6 9:2, 11 10:7 thoughts 9:9 three 2:8 three-to-four 3:4 Tier 1:5 time 8:2 times 2:18 today 4:7 5:22 told 2:15 traffic 7:3 Transcript 1:19 transfer 7:24 trucks 3:5 6:22 7:3 true 3:10 11:4 trust 7:21 Tubac 9:7 Tucson 1:11, 23 2:3 3:7, 12, 13 5:24 Tumacacori 9:16 two 7:2</p> <p>&lt; U &gt; U.S 4:6 University 3:24 upgrade 5:3 upset 6:12</p> <p>&lt; V &gt; Vail 2:10 3:3 Valley 3:1, 11 9:10 value 2:21 Ventures 2:8 visited 6:20</p> <p>&lt; W &gt; want 4:23 5:4 6:10, 14 wanted 5:21 6:17 wanting 7:8 water 3:12, 12, 13 way 6:15, 22 Wednesday 1:10 well 8:3, 15 we're 4:10, 20, 21 5:4, 16 7:22 8:19 we've 7:2 widen 7:2 wild 7:10 work 5:16, 20 working 4:11</p>	<p>6:15 world 4:4 written 5:18</p> <p>&lt; Y &gt; year 4:15 8:16 years 8:16, 16 10:5, 8</p>
---	--	--	--	---

1

2

3

4

5

Interstate 11 Tier 1 Environmental Impact Statement

6

Public Scoping Meeting

7

Public Comments

8

9

10

Thursday, June 23, 2016

11

Marana, Arizona

12

13

14

15

16

17

18

19

Transcript Prepared by Kimberley W. Gauthier

20

Certified Court Reporter No. 50767

21

Colville & Associates

22

1309 E. Broadway

23

Tucson, AZ 85719-5824

24

(520) 884-9041 FAX (520) 623-1681

25

Reporter Agency Firm No. R1032

1 The following comments were made for the record by  
2 members of the public:

3 [REDACTED] Picture Rocks:

4 [REDACTED] I am  
5 a resident of Picture Rocks in the Avra Valley. I am  
6 the [REDACTED] for the Citizens for Picture Rocks, but  
7 I am here today speaking on my own behalf. The Avra  
8 Valley Picture Rocks area, which at the last census  
9 has about 10,000 residents, is a unique area. It is  
10 unique not because I think so, but because the  
11 citizens of the state and the nation have put  
12 boundaries around many land formations and areas to  
13 keep its uniqueness intact.

14 I am speaking of the Saguaro West  
15 National Park and saguaro wilderness, the Ironwood  
16 National Monument; the Pima County Tucson Mountain  
17 Park, the U.S. Bureau of Reclamation, Tucson Wildlife  
18 mitigation corridor, the Tohono O'odham Indian  
19 Reservation, the Bureau of Reclamation Land and  
20 Central Arizona Water Project, the Desert Museum and  
21 surrounding grounds.

22 I am aware that citizens have, in the  
23 past, created special boundaries through their  
24 representatives, and usually I am one who says the  
25 boundaries should be the controlling limit to allow

1 any development outside of those boundaries not to be  
2 hindered.

3 For example, there are current disputes  
4 over development of Gettysburg National Monument and  
5 cemetery. In Arizona, there is a historic site and  
6 park at the former state prison in Yuma. And I-8 runs  
7 so close to Yuma, they could touch the cars as they go  
8 by the prison site.

9 I point out these two sites, one  
10 national and one Arizona state, because they  
11 illustrate the difference in what may be dealt with in  
12 one matter versus what we are dealing with in this  
13 matter. Gettysburg cemetery and Yuma prison are  
14 historic sites that can be limited and have  
15 development right outside those limits.

16 The sites in the Avra Valley have all  
17 been designated to keep development at bay, so that  
18 the unique nature of the Avra Valley and its people  
19 and animals and its natural geographic sites are  
20 preserved in a manner that reflects the desire to have  
21 those sites (and thereby much of Avra Valley) to go  
22 forward for future generations as much preserved then  
23 as they are now.

24 It is inconsistent with the intent of  
25 these many set-asides that a freeway should wind its

1 way between these delineated public lands and  
2 reservations of the Avra Valley. This is especially  
3 the case when there are other alternatives to  
4 accomplish the desired goal of a route for direct  
5 traffic. Truck stops and interstate highways are not  
6 the desired development for the Avra Valley. There  
7 simply is no way to mitigate the noise and other  
8 pollution that will flow to the set-aside lands in  
9 this designated unique valley.

10 It is obvious to anyone who lives or  
11 visits that Avra Valley cannot accommodate an  
12 interstate and retain all the currently designated  
13 set-asides in the environment they were established  
14 for.

15 Thank you for your attention.

16

17 [REDACTED] Age 13, Marana:

18 I don't think that they should build  
19 the new freeway because that would like go through the  
20 national park and the laws say that it's not legal for  
21 them to do that. And it would go through an Indian  
22 reservation, and you're not allowed to do that either.  
23 It would also uproot a lot of people from their homes,  
24 and they would have to leave their own homes, and then  
25 it would take away businesses from other places. And

1 a lot of people would lose their jobs and more people  
2 would have to go searching for jobs and then lose  
3 their houses because they wouldn't have any work.

4

5

6 I'm a resident of after Avra Valley. I  
7 could present a rational cogent presentation of  
8 reasons that would be against the building of the  
9 Interstate 11, but then why should I? These reasons  
10 have been there for years, and yet in spite of them,  
11 this process will continue.

12 I feel those that would benefit most  
13 are corporate and business interests and politicians  
14 who would, by and large, be unaffected by the impact  
15 of not just an interstate, but an industrial corridor  
16 that is proposed to go through the heart of the  
17 valley.

18 I realize I'm being very selfish, and a  
19 NIMBY -- not in my backyard -- but if people don't  
20 speak up -- we've invested a great deal in building a  
21 home here and we moved out here for a lifestyle of  
22 quiet and just a very enjoyable, rich environment.  
23 And this would be degraded, taken away, by the  
24 construction of this industrial corridor.

25 Five years ago, this project was rated



1 one of the ten most dubious highway ventures in  
2 America, and I believe it conditions to be so. It's  
3 speculative as to what could happen. For twenty  
4 years, there have been free trade zones set up in  
5 Tucson and Las Vegas, and very little has come from  
6 that accept. I just feel I must stand up and defend  
7 my home against what I see as a boondoggle.

8

9

10 [REDACTED] board of directors  
11 of the Avra Valley Water Co-op. My concern is that  
12 we're about to entertain a \$700,000 new well and  
13 improvement into a reservoir for the members of the  
14 co-op. Now, some of the proposed things I've seen  
15 here on the roadwork may affect our water shed and  
16 also various wells and pipelines that we've got  
17 running, and I would like somehow to have direct input  
18 from the DOT in relationship to our issues in regard  
19 to this matter.

20

21

22 Avoid the CPA reclaim area of the  
23 central Arizona project. Stay west of there. That's  
24 about all I have to say.

25

(Comments concluded at 6:15 p.m.)

1 State of Arizona           )  
  ) ss.  
2 County of Pima           )

3           Be it known that the foregoing comments were taken  
4 before me; that the foregoing pages are a full, true and  
5 accurate record of the proceedings, all done to the best of  
6 my skill and ability; that the proceedings were taken down  
7 by me in shorthand and thereafter reduced to print under my  
8 direction.

9

10

11

12

13

14

---

Kimberley W. Gauthier, RPR  
Certified Reporter  
Arizona CR No. 50767

15

16

17

18

19

20

21

22

23

24

25

**WORD INDEX**

&lt; \$ &gt;

**\$700,000** 6:12

&lt; 1 &gt;

**1** 1:5**10,000** 2:9**11** 1:5 5:9**13** 4:17**1309** 1:22

&lt; 2 &gt;

**2016** 1:10**23** 1:10

&lt; 5 &gt;

**50767** 1:20 7:15**520** 1:24, 24

&lt; 6 &gt;

**6:15** 6:25**623-1681** 1:24

&lt; 8 &gt;

**85719-5824** 1:23**884-9041** 1:24

&lt; A &gt;

**ability** 7:6**accept** 6:6**accommodate** 4:11**accomplish** 4:4**accurate** 7:5**affect** 6:15**Age** 4:17**Agency** 1:25**ago** 5:25**allow** 2:25**allowed** 4:22**alternatives** 4:3**America** 6:2**animals** 3:19**area** 2:8, 9 6:22**areas** 2:12**Arizona** 1:11**2:20** 3:5, 10**6:23** 7:1, 15**Associates** 1:21**attention** 4:15**Avoid** 6:22**Avra** 2:5, 7 3:16,**18, 21** 4:2, 6, 11**5:6** 6:11**aware** 2:22**AZ** 1:23

&lt; B &gt;

**backyard** 5:19**bay** 3:17**behalf** 2:7**believe** 6:2**benefit** 5:12**best** 7:5**board** 6:10**boondoggle** 6:7**boundaries** 2:12,**23, 25** 3:1**Broadway** 1:22**build** 4:18**building** 5:8, 20**Bureau** 2:17, 19**business** 5:13**businesses** 4:25

&lt; C &gt;

**cars** 3:7**case** 4:3**cemetery** 3:5, 13**census** 2:8**Central** 2:20 6:23**Certified** 1:20**7:14****Citizens** 2:6, 11, 22**close** 3:7**cogent** 5:7**Colville** 1:21**come** 6:5**Comments** 1:7**2:1** 6:25 7:3**concern** 6:11**concluded** 6:25**conditions** 6:2**construction** 5:24**continue** 5:11**controlling** 2:25**Co-op** 6:11, 14**corporate** 5:13**corridor** 2:18**5:15, 24****County** 2:16 7:2**Court** 1:20**CPA** 6:22**CR** 7:15**created** 2:23**current** 3:3**currently** 4:12

&lt; D &gt;

**David** 5:5**deal** 5:20**dealing** 3:12**dealt** 3:11**defend** 6:6**degraded** 5:23**delineated** 4:1**Desert** 2:20**designated** 3:17**4:9, 12****desire** 3:20**desired** 4:4, 6**development** 3:1,**4, 15, 17** 4:6**difference** 3:11**direct** 4:4 6:17**direction** 7:8**directors** 6:10**disputes** 3:3**DOT** 6:18**dubious** 6:1

&lt; E &gt;

**either** 4:22**enjoyable** 5:22**entertain** 6:12**environment** 4:13**5:22****Environmental** 1:5**especially** 4:2**established** 4:13**example** 3:3

&lt; F &gt;

**FAX** 1:24**feel** 5:12 6:6**Firm** 1:25**Five** 5:25**Flemm** 2:3, 4**F-I-e-m-m** 2:4**Flores** 4:17**flow** 4:8**following** 2:1**foregoing** 7:3, 4**formations** 2:12**former** 3:6**forward** 3:22**free** 6:4**freeway** 3:25**4:19****full** 7:4**future** 3:22

&lt; G &gt;

**Gauthier** 1:19**7:14****generations** 3:22**geographic** 3:19**Gettysburg** 3:4, 13**go** 3:7, 21 4:19,**21** 5:2, 16**goal** 4:4**great** 5:20**grounds** 2:21

&lt; H &gt;

**happen** 6:3**heart** 5:16**highway** 6:1**highways** 4:5**hindered** 3:2**historic** 3:5, 14**home** 5:21 6:7**homes** 4:23, 24**houses** 5:3

&lt; I &gt;

**I-8** 3:6**illustrate** 3:11**Impact** 1:5 5:14**improvement** 6:13**inconsistent** 3:24**Indian** 2:18 4:21**industrial** 5:15, 24**input** 6:17**intact** 2:13**intent** 3:24**interests** 5:13**Interstate** 1:5**4:5, 12** 5:9, 15**invested** 5:20**Ironwood** 2:15**issues** 6:18**its** 2:13 3:18, 19,**25**

&lt; J &gt;

**jobs** 5:1, 2**June** 1:10

&lt; K &gt;

**keep** 2:13 3:17**Kimberley** 1:19**7:14****known** 7:3**Koeppel** 6:9

&lt; L &gt;

**land** 2:12, 19**lands** 4:1, 8**large** 5:14**Las** 6:5**laws** 4:20**leave** 4:24**legal** 4:20**Lewis** 4:17**lifestyle** 5:21**limit** 2:25**limited** 3:14**limits** 3:15**little** 6:5**lives** 4:10**lose** 5:1, 2**lot** 4:23 5:1**Lusk** 6:21

&lt; M &gt;

**manner** 3:20**Marana** 1:11 4:17**matter** 3:12, 13**6:19****Meeting** 1:6**member** 6:10**members** 2:2**6:13****Micha** 6:9**Michael** 6:21**michaellusk1994@g****mail.com** 6:21**michakoeppel@yah****oo.com** 6:9**mitigate** 4:7**mitigation** 2:18**Monument** 2:16**3:4****Mountain** 2:16**moved** 5:21**Museum** 2:20

&lt; N &gt;

**name** 2:4**nation** 2:11**National** 2:15, 16**3:4, 10** 4:20**natural** 3:19**nature** 3:18**new** 4:19 6:12**NIMBY** 5:19**noise** 4:7

&lt; O &gt;

**obvious** 4:10**O'dham** 2:18**outside** 3:1, 15

&lt; P &gt;

**p.m** 6:25**pages** 7:4**Park** 2:15, 17 3:6**4:20****Paul** 2:3, 4**paulflemm@aol.co****m** 2:3**people** 3:18 4:23**5:1, 1, 19****Picture** 2:3, 5, 6, 8**Pima** 2:16 7:2**pipelines** 6:16**places** 4:25**point** 3:9**politicians** 5:13**pollution** 4:8**Prepared** 1:19**present** 5:7**presentation** 5:7**preserved** 3:20, 22**print** 7:7**prison** 3:6, 8, 13**proceedings** 7:5, 6**process** 5:11**Project** 2:20 5:25**6:23****proposed** 5:16**6:14****Public** 1:6, 7 2:2**4:1****put** 2:11

&lt; Q &gt;

**quiet** 5:22

&lt; R &gt;

**R1032** 1:25**rated** 5:25**rational** 5:7**realize** 5:18**reasons** 5:8, 9**reclaim** 6:22**Reclamation** 2:17,**19****record** 2:1 7:5

**set-asides** 3:25  
4:13

**Shaffer** 5:5

**shed** 6:15

**shorthand** 7:7

**simply** 4:7

**site** 3:5, 8

**sites** 3:9, 14, 16,  
19, 21

**skill** 7:6

**speak** 5:20

**speaking** 2:7, 14

**special** 2:23

**speculative** 6:3

**spite** 5:10

**ss** 7:1

**stand** 6:6

**state** 2:11 3:6,  
10 7:1

**Statement** 1:5

**Stay** 6:23

**stops** 4:5

**surrounding** 2:21

**< T >**

**take** 4:25

**taken** 5:23 7:3, 6

**ten** 6:1

**Thank** 4:15

**things** 6:14

**think** 2:10 4:18

**Thursday** 1:10

**Tier** 1:5

**today** 2:7

**Tohono** 2:18

**touch** 3:7

**trade** 6:4

**traffic** 4:5

**Transcript** 1:19

**treasurer** 2:6

**Truck** 4:5

**true** 7:4

**Tucson** 1:23 2:16,  
17 6:5

**twenty** 6:3

**two** 3:9

**< U >**

**U.S** 2:17

**unaffected** 5:14

**unique** 2:9, 10  
3:18 4:9

**uniqueness** 2:13

**uproot** 4:23

**usually** 2:24

**< V >**

**Valley** 2:5, 8

3:16, 18, 21 4:2, 6,  
9, 11 5:6, 17 6:11

**various** 6:16

**Vegas** 6:5

**ventures** 6:1

**versus** 3:12

**visits** 4:11

**< W >**

**Water** 2:20 6:11,  
15

**way** 4:1, 7

**well** 6:12

**wells** 6:16

**we're** 6:12

**West** 2:14 6:23

**we've** 5:20 6:16

**wilderness** 2:15

**Wildlife** 2:17

**wind** 3:25

**work** 5:3

**< Y >**

**years** 5:10, 25

6:4

**Yuma** 3:6, 7, 13

**< Z >**

**zones** 6:4

Arizona Department of Transportation  
Interstate 11 Corridor  
Tier 1 Environmental Impact Statement  
Nogales to Wickenburg

Public Comment

June 29, 2016

3:40 p.m.

Wickenburg Community Center  
160 N. Valentine Street  
Wickenburg, Arizona 85390

Reported by:

Kayla Burgus, CSR

IA CR No. 1358

1 (The public comment commenced at 3:40 p.m.)

2 [REDACTED] I've lived here in  
3 Wickenburg for over 50 years. My complaint is that  
4 ADOT, when it created Highway 60 or whatever you call  
5 this highway here, failed to put a sidewalk in  
6 that -- to go to Country Kitchen.

7 It would actually be an extension of the  
8 bridge walk because the bridge walk goes almost  
9 halfway past that Aztec trailer park. So it only has  
10 to have the sidewalk from there to the driveway that  
11 goes down into the park because it already has a  
12 sidewalk to Country Kitchen, but it doesn't have it  
13 from the board walk -- or, board walk -- bridge walk,  
14 and so that needs to be continued because I call it a  
15 cow path now. It's uneven ground, and it's narrow  
16 and large. It goes narrow, narrow, narrow, then  
17 comes out a little bit, but it is pebble and rock and  
18 is all kinds of things. Too narrow. And it's a  
19 hazard. No one has put any signs, use at your own  
20 risk.

21 And they took away the crosswalk that  
22 they had, which they said was temporary. And they  
23 said that was fine at a big meeting like this; and we  
24 said that was fine. We could wait for the sidewalk,  
25 but we're waiting for five years still. I think

1 that's what the town of Wickenburg said. I've been  
2 complaining for five years.

3 I guess that's about it. The sidewalk.  
4 They promised the sidewalk, and they took away the  
5 crosswalk. They had a temporary -- which we agreed  
6 to -- the temporary crosswalk, so we could go across  
7 the traffic, but we can't do that anymore, and I --  
8 people like me can't use uneven ground.

9 And I saw -- I was sitting in McDonald's,  
10 and I saw a mother and her child walking over there  
11 through the window. And the child disappeared, and  
12 his momma pulling him up. If she hadn't have been  
13 holding onto him, he would have gone down into the  
14 trailer park. So there's not even a safety rail to  
15 stop it. I think that's it.

16 [REDACTED] Vista Royale  
17 subdivision, and 93 backs up to my yard.

18 We were not from this area. We came from  
19 Vegas. Had I known that 93 was a very busy road, I  
20 never would have bought my house there.

21 We've been here 11 years, and we've had  
22 many problems with people crawling underneath the  
23 county fence. It's nothing but four strings of  
24 barbed wire. And one of them was an incident where  
25 the guy crawled under at 5:15 in the morning, even

1     though the house next door to me was lit up like a  
2     Christmas tree, and was banging on our patio glass  
3     doors. I believe if my husband hadn't have gone to  
4     the window, he would have broken in.

5             All he said was, car no go. My husband  
6     said, sheriff. We called the sheriff at 5:20 in the  
7     morning, and they didn't come until 6:30, and this  
8     jerk was out there on our patio screaming and  
9     hollering in whatever gibberish language he was  
10    speaking in, and then he left. And then the sheriff  
11    showed up at our house at 6:30 with him in the  
12    backseat of their SUV, and I wanted to make -- I  
13    wanted him arrested, and they didn't do it. I said  
14    the next one gets shot. I've had it.

15            The traffic is awful. There have been  
16    three deaths from people outside of our complex who  
17    died on that road. One of them in a fiery  
18    explosion -- no, two of them, excuse me, were fiery  
19    explosions.

20            They drive -- the speed limit is 65, and  
21    I wait until every car goes by because they're going  
22    at least 80. And when I come home from Wickenburg,  
23    we have an egress that will take you to a left turn  
24    to get into our complex. There's a gorn (phonetic)  
25    in front of it, and I pull into that to save my life



1 because these people are driving like maniacs. And  
2 that includes the truck drivers. They put those -- I  
3 don't know what you call them. They're at the end of  
4 a lane and in the middle of the road and at the end  
5 of lanes to let you know you're going over, and you  
6 hear that all day and night.

7 Have a nice day.

8 No. Let's tell them -- they can go down  
9 60 where Wickenburg owns this land in Forepaugh,  
10 which is something like, I think, 20 miles away from  
11 Wickenburg, west of 60. There are rumors that they  
12 want to put industrial and a train depot there. Let  
13 it go down there and then down 71 back to 93.

14 And as it is with the two lanes, I'd  
15 still rather have a 12-foot concrete wall. I hate  
16 seeing that.

17 I lived in Chicago with awful traffic.  
18 This is even worse.

19 [REDACTED] [REDACTED] in Vista Royale,  
20 and due to the new improvements on 93, the truck  
21 traffic is unbearable out there now with the noise;  
22 and the trucks are going by with their Jake brakes  
23 on, and we'd like to have them put a sign up that  
24 says no Jake brakes in that area from, let's say, the  
25 191-mile marker past to the 193-mile marker.

1           The neighbors are getting to the point  
2 where the noise there is almost unbearable sometimes,  
3 due to the truck traffic and traffic on the weekends.

4           [REDACTED] So my question is coming  
5 from the perspective of the government. We have  
6 people here with million-dollar homes that are out  
7 here on the mountain tops, and they came here for the  
8 serenity and to get away from the cities. So you  
9 have that perspective.

10           In fact, I asked one one time, I said,  
11 how much you pay for your house? He said, I bought  
12 the view; they threw in the house. So you can see  
13 that they are very livid on why they moved here.

14           From the same standpoint on the other  
15 side of the coin, you have people that are in  
16 business here. When the roundabouts went in, I asked  
17 one of the businesses downtown how much business they  
18 lost. They said they lost half of their business. I  
19 ask him, I said, if you were in government, what  
20 would you do? He said, when the sun went down, I'd  
21 put a detour sign on each one of the roundabouts and  
22 divert all the traffic through Wickenburg.

23           So now from a government standpoint,  
24 where is this sweet spot when you're trying to  
25 accomplish that, make both sides happy?

1                   How much weight is on cost? I would  
2 think that the -- going beside Wickenburg here would  
3 be cost prohibitive for the amount of construction  
4 that is needed and the amount of properties that  
5 would have to be bought out.

6                   [REDACTED] [REDACTED]  
7 [REDACTED] I own a business and a residence  
8 for 17 years. I cannot afford for it to come on  
9 Vulture Mine Road. And it would inhibit the schools  
10 that were built -- the middle school and the high  
11 school that are right next to me there on Vulture  
12 Mine Road. So I just am opposing it ever going  
13 through Vulture Mine Road, as it's been discussed  
14 before.

15                   [REDACTED] Well, I'm just -- I live  
16 off of 93. I'll show you where we're at and what my  
17 concerns are.

18                   As of now, we are right here between 71  
19 and 89. We're, like, right -- right there  
20 (indicating).

21                   So this is hard for me to see where this  
22 would go, if this is just proposed, but right now --  
23 and I know they're not talking about the roundabouts,  
24 but the increase of traffic already has been just  
25 hideous and noisy, as well, on 93. So that's one

1 reason I wouldn't even want it to go anywhere near  
2 where we live because we already have all the noise  
3 that we can handle from the way the traffic is now.  
4 It's ridiculous.

5 We moved here 15 years ago. It was very  
6 quiet and very peaceful. And then they added all  
7 these roundabouts in there, and the traffic is just  
8 an accordion. Accidents every single weekend. We  
9 lost five lives two weeks on that highway. We just  
10 don't -- there's been so many fatalities on that  
11 highway as it is. I just don't see where we need  
12 more traffic.

13 [REDACTED] So I am a member of the  
14 National Defense Transportation Association, which as  
15 you would guess, have a lot to do with trucking. And  
16 several years ago, Congressman Frank, then our local  
17 congressman, gave a presentation to our chapter about  
18 I-11, which generated a great deal of discussion at  
19 our chapter meeting.

20 Members of our chapter seem to feel that  
21 some sort of an I-11 corridor that went from Buckeye,  
22 Buckeye-ish, due north past the west side of  
23 Wickenburg and eventually joined up with Interstate  
24 93 around Scotts corner (phonetic) -- which is the  
25 actual junction of U.S. 93 and Arizona 71 -- would be

1 an excellent route to take because many of the  
2 truckers are already getting off Interstate 10 down  
3 around 355th Avenue, coming a little bit west, and  
4 then going north on South Vulture Mine Road and then  
5 through the west side of Wickenburg up to 93 and  
6 north.

7 So they had this sense that an interstate  
8 that would actually follow that route except maybe  
9 20 miles further west as a new interstate would be a  
10 perfect route for the trucking industry, remembering  
11 that I don't represent the trucking industry.

12 And that's all I have to say.

13 [REDACTED] The roundabouts are a  
14 great idea, but they need to be larger. That makes  
15 sense to me. I mean, too many accidents are occurred  
16 because they're too small.

17 (The public comment concluded at 6:30 p.m.)  
18  
19  
20  
21  
22  
23  
24  
25

C E R T I F I C A T E

I HEREBY CERTIFY that the foregoing public comment was taken by me, Kayla Burgus; that all the proceedings had upon the taking of said public comment were taken down by me in shorthand and thereafter reduced to print by computer-aided transcription under my direction; that the foregoing pages are a full, true, and accurate transcript of said record, all done to the best of my skill and ability.

DATED this 11th day of July, 2016.

---

Kayla Burgus, CSR  
IA CR No. 1358

<b>A</b>	bought 3:20 6:11 7:5 brakes 5:22 5:24 bridge 2:8,8 2:13 broken 4:4 BROWN 8:13 Buckeye 8:21 Buckeye-ish 8:22 built 7:10 Burgus 1:24 10:3,13 business 6:16,17,18 7:7 businesses 6:17 busy 3:19	<b>Community</b> 1:15 complaining 3:2 complaint 2:3 complex 4:16 4:24 computer... 10:6 concerns 7:17 concluded 9:17 concrete 5:15 congressman 8:16,17 construc... 7:3 continued 2:14 corner 8:24 corridor 1:4 8:21 cost 7:1,3 Country 2:6 2:12 county 3:23 cow 2:15 CR 1:25 10:14 crawled 3:25 crawling 3:22 created 2:4 crosswalk 2:21 3:5,6 CSR 1:24 10:13	<b>DEBBIE</b> 7:15 <b>Defense</b> 8:14 <b>Department</b> 1:3 depot 5:12 detour 6:21 died 4:17 direction 10:7 disappeared 3:11 discussed 7:13 discussion 8:18 divert 6:22 door 4:1 doors 4:3 downtown 6:17 drive 4:20 drivers 5:2 driveway 2:10 driving 5:1 due 5:20 6:3 8:22	<b>F</b> 10:1 fact 6:10 failed 2:5 fatalities 8:10 feel 8:20 fence 3:23 fiery 4:17 4:18 fine 2:23,24 five 2:25 3:2 8:9 follow 9:8 foregoing 10:2,7 Forepaugh 5:9 four 3:23 Frank 8:16 front 4:25 full 10:8 further 9:9
	<b>C</b> C 10:1,1 call 2:4,14 5:3 called 4:6 car 4:5,21 Center 1:15 CERTIFY 10:2 chapter 8:17 8:19,20 Chicago 5:17 child 3:10 3:11 Christmas 4:2 cities 6:8 coin 6:15 come 4:7,22 7:8 comes 2:17 coming 6:4 9:3 commenced 2:1 comment 1:9 2:1 9:17 10:3,5	<b>D</b> DATED 10:11 DAVID 8:13 day 5:6,7 10:11 deal 8:18 deaths 4:16	<b>E</b> E 9:13 10:1 10:1 egress 4:23 Environm... 1:5 eventually 8:23 EVERETT 6:4 excellent 9:1 excuse 4:18 explosion 4:18 explosions 4:19 extension 2:7	<b>G</b> generated 8:18 getting 6:1 9:2 gibberish 4:9 glass 4:2 go 2:6 3:6 4:5 5:8,13 7:22 8:1 goes 2:8,11 2:16 4:21 going 4:21 5:5,22 7:2 7:12 9:4 gorn 4:24 government 6:5,19,23 great 8:18 9:14 ground 2:15 3:8 guess 3:3 8:15
<b>B</b>	back 5:13 backs 3:17 backseat 4:12 banging 4:2 barbed 3:24 believe 4:3 best 10:9 big 2:23 bit 2:17 9:3 board 2:13 2:13		<b>F</b>	

<b>guy</b> 3:25	9:2,7,9	8:9	<b>night</b> 5:6	<b>properties</b>
<b>H</b>	<b>J</b>	<b>lot</b> 8:15	<b>Nogales</b> 1:6	7:4
<b>half</b> 6:18	<b>J</b> 3:16	<b>M</b>	<b>noise</b> 5:21	<b>proposed</b>
<b>halfway</b> 2:9	<b>Jake</b> 5:22,24	<b>maniacs</b> 5:1	6:2 8:2	7:22
<b>handle</b> 8:3	<b>JEANNE</b> 2:2	<b>marker</b> 5:25	<b>noisy</b> 7:25	<b>public</b> 1:9
<b>happy</b> 6:25	<b>jerk</b> 4:8	5:25	<b>north</b> 8:22	2:1 9:17
<b>hard</b> 7:21	<b>JERRY</b> 5:19	<b>McDonald's</b>	9:4,6	10:3,5
<b>hate</b> 5:15	<b>joined</b> 8:23	3:9	<b>O</b>	<b>pull</b> 4:25
<b>hazard</b> 2:19	<b>July</b> 10:11	<b>mean</b> 9:15	<b>occurred</b>	<b>pulling</b> 3:12
<b>hear</b> 5:6	<b>junction</b>	<b>meeting</b> 2:23	9:15	<b>put</b> 2:5,19
<b>hideous</b> 7:25	8:25	8:19	<b>opposing</b>	5:2,12,23
<b>high</b> 7:10	<b>June</b> 1:10	<b>member</b> 8:13	7:12	6:21
<b>highway</b> 2:4	<b>K</b>	<b>Members</b> 8:20	<b>outside</b> 4:16	<b>Q</b>
2:5 8:9,11	<b>Kayla</b> 1:24	<b>middle</b> 5:4	<b>owns</b> 5:9	<b>question</b> 6:4
<b>holding</b> 3:13	10:3,13	7:10	<b>P</b>	<b>quiet</b> 8:6
<b>hollering</b>	<b>kinds</b> 2:18	<b>miles</b> 5:10	<b>p.m</b> 1:11 2:1	<b>R</b>
4:9	<b>Kitchen</b> 2:6	9:9	9:17	<b>R</b> 10:1
<b>home</b> 4:22	2:12	6:6	<b>pages</b> 10:8	<b>rail</b> 3:14
<b>homes</b> 6:6	<b>KLAUS</b> 3:16	<b>Mine</b> 7:7,9	<b>park</b> 2:9,11	<b>reason</b> 8:1
<b>house</b> 3:20	<b>know</b> 5:3,5	7:12,13	3:14	<b>record</b> 10:9
4:1,11	7:23	9:4	<b>path</b> 2:15	<b>reduced</b> 10:6
6:11,12	<b>known</b> 3:19	<b>momma</b> 3:12	<b>patio</b> 4:2,8	<b>remembering</b>
<b>husband</b> 4:3	<b>L</b>	<b>morning</b> 3:25	<b>pay</b> 6:11	9:10
4:5	<b>land</b> 5:9	4:7	<b>peaceful</b> 8:6	<b>Reported</b>
<b>I</b>	<b>lane</b> 5:4	<b>mother</b> 3:10	<b>pebble</b> 2:17	1:23
<b>I-11</b> 8:18,21	<b>lanes</b> 5:5,14	<b>mountain</b> 6:7	<b>people</b> 3:8	<b>represent</b>
<b>IA</b> 1:25	<b>language</b> 4:9	<b>moved</b> 6:13	3:22 4:16	9:11
10:14	<b>large</b> 2:16	8:5	5:1 6:6,15	<b>residence</b>
<b>idea</b> 9:14	<b>larger</b> 9:14	<b>N</b>	<b>perfect</b> 9:10	7:7
<b>Impact</b> 1:5	<b>left</b> 4:10,23	<b>N</b> 1:16	<b>perspective</b>	<b>ridiculous</b>
<b>improvem...</b>	<b>let's</b> 5:8,24	<b>narrow</b> 2:15	6:5,9	8:4
5:20	<b>life</b> 4:25	2:16,16,16	<b>phonetic</b>	<b>right</b> 7:11
<b>incident</b>	<b>limit</b> 4:20	2:18	4:24 8:24	7:18,19,19
3:24	<b>lit</b> 4:1	<b>National</b>	<b>PHYLLIS</b> 3:16	7:22
<b>includes</b> 5:2	<b>little</b> 2:17	8:14	<b>point</b> 6:1	<b>risk</b> 2:20
<b>increase</b>	9:3	<b>near</b> 8:1	<b>POLLY</b> 7:6	<b>road</b> 3:19
7:24	<b>live</b> 3:16	<b>need</b> 8:11	<b>presenta...</b>	4:17 5:4
<b>indicating</b>	5:19 7:6	9:14	8:17	7:7,9,12
7:20	7:15 8:2	<b>needed</b> 7:4	<b>print</b> 10:6	7:13 9:4
<b>industrial</b>	<b>lived</b> 2:2	<b>needs</b> 2:14	<b>problems</b>	<b>rock</b> 2:17
5:12	5:17	<b>neighbors</b>	3:22	<b>roundabouts</b>
<b>industry</b>	<b>lives</b> 8:9	6:1	<b>proceedings</b>	6:16,21
9:10,11	<b>livid</b> 6:13	<b>never</b> 3:20	10:4	7:23 8:7
<b>inhibit</b> 7:9	<b>local</b> 8:16	<b>new</b> 5:20 9:9	<b>prohibitive</b>	9:13
<b>interstate</b>	<b>lost</b> 6:18,18	<b>nice</b> 5:7	7:3	<b>route</b> 9:1,8
1:4 8:23			<b>promised</b> 3:4	9:10



Royale 3:16 5:19 rumors 5:11	speed 4:20 spot 6:24 standpoint 6:14,23 Statement 1:5 STATEN 7:6 stop 3:15 Street 1:16 strings 3:23 subdivision 3:17 sun 6:20 SUV 4:12 sweet 6:24	10:7 Transpor... 1:3 8:14 tree 4:2 truck 5:2,20 6:3 truckers 9:2 trucking 8:15 9:10 9:11 trucks 5:22 true 10:8 trying 6:24 turn 4:23 two 4:18 5:14 8:9	8:1 wanted 4:12 4:13 way 8:3 we're 2:25 7:16,19 we've 3:21 3:21 weekend 8:8 weekends 6:3 weeks 8:9 weight 7:1 went 6:16,20 8:21 west 5:11 8:22 9:3,5 9:9 Wickenburg 1:6,15,17 2:3 3:1 4:22 5:9 5:11 6:22 7:2 8:23 9:5 window 3:11 4:4 wire 3:24 worse 5:18 wouldn't 8:1	1358 1:25 10:14 15 8:5 160 1:16 17 7:8 191-mile 5:25 193-mile 5:25
S safety 3:14 save 4:25 saw 3:9,10 says 5:24 school 7:10 7:11 schools 7:9 Scotts 8:24 screaming 4:8 see 6:12 7:21 8:11 seeing 5:16 sense 9:7,15 serenity 6:8 sheriff 4:6 4:6,10 shorthand 10:5 shot 4:14 show 7:16 showed 4:11 side 6:15 8:22 9:5 sides 6:25 sidewalk 2:5 2:10,12,24 3:3,4 sign 5:23 6:21 signs 2:19 SIKLES 6:4 single 8:8 sitting 3:9 skill 10:9 small 9:16 SMITH 5:19 7:15 sort 8:21 South 7:6 9:4 speaking 4:10	T T 10:1,1 take 4:23 9:1 taken 10:3,5 talking 7:23 tell 5:8 temporary 2:22 3:5,6 things 2:18 think 2:25 3:15 5:10 7:2 THOMAS 9:13 three 4:16 threw 6:12 Tier 1:5 time 6:10 TIRPAK 2:2 tops 6:7 town 3:1 traffic 3:7 4:15 5:17 5:21 6:3,3 6:22 7:24 8:3,7,12 trailer 2:9 3:14 train 5:12 transcript 10:8 transcri...	U U.S 8:25 unbearable 5:21 6:2 underneath 3:22 uneven 2:15 3:8 use 2:19 3:8	V Valentine 1:16 Vegas 3:19 view 6:12 Vista 3:16 5:19 Vulture 7:7 7:9,11,13 9:4	2 20 5:10 9:9 2016 1:10 10:11 29 1:10
				3 3:40 1:11 2:1 355th 9:3
				4
				5 5:15 3:25 5:20 4:6 50 2:3
				6 6:30 4:7,11 9:17 60 2:4 5:9 5:11 65 4:20
				7 71 5:13 7:18 8:25
				8 80 4:22 850 7:6 85390 1:17 89 7:19
				9 93 3:17,19 5:13,20

7:16,25  
8:24,25  
9:5

## Email Comments

---

**From:** [REDACTED]  
**Sent:** Monday, June 20, 2016 5:09 PM  
**To:** I-11ADOTstudy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern,

As I review the map of the central corridor, it would appear that using the existing route of Hwy 85 would make a lot of sense. A more direct route, existing infrastructure, existing corridor, fewer obstructions, etc.

I also noticed that parts of Arlington, AZ are on the map and there are challenges to putting the corridor in that area. Namely, mountains, flood plains, wilderness area, etc.

--

Thank you,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



**From:** [REDACTED]  
**Sent:** Tuesday, June 14, 2016 7:56 PM  
**To:** I-11ADOTstudy

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Can you tell me where I can see maps of the proposed routes from Nogales to Phoenix?

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Sunday, July 10, 2016 9:28 AM  
**To:** I-11ADOTstudy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Subject: I oppose I-11

---

To whom it may concern:

Not long ago two bighorn sheep were spotted in the Tucson Mountains. Biologists traced their tracks west across a break in the CAP canal that was designed and built for wildlife passage.

Now a proposed freeway, I-11, could keep them from returning—and threatens far more.

The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West.

Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.

I'm also concerned about impacts to federally and locally protected open space, including Ironwood Forest National Monument, Saguaro National Park, the Bureau of Reclamation's Central Arizona Project mitigation corridor, City of Tucson mitigation lands for their Avra Valley Habitat Conservation Plan, and Pima County mitigation lands for their Multi-Species Habitat Conservation Plan.

There is no need for a new freeway. I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. I'm in agreement with the 2007 Pima County Board of Supervisors Resolution opposing *"the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated."*

Under the right circumstances, I could support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.

Thank you for your kind consideration,  
[REDACTED]

**Sent:** Monday, July 11, 2016 10:15 AM  
**To:** I-11ADOTstudy  
**Subject:** [FWD: Proposed Interstate 11]

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I have been trying to email my comments to you but the email given me was missing Study. I hope you receive the comments now and will take into consideration.

----- Original Message -----

Subject: Proposed Interstate 11

Date: Fri, July 08, 2016 11:17 pm

7-8-2016

*Why would you even consider invading the Sonoran Desert, Ironwood Forest and the Saguaro National Park West????*

*These are places found nowhere else and have a world wide admiration! Why would anyone think of large 18 wheeler semi trucks rolling through this pristine area would be good for anyone or anything? The exception would be the few individuals who would be benefiting because they placed themselves in a position of owning a considerable amount of land in the corridor and of course are seen as big supporters of this corridor through Avra Valley. Pollution!!! Noise!!!! Light pollution affecting Kitt Peak!!!*

*Disturbing this whole area is obscene for the benefit of business in Nevada to the manufacture production in Mexico. It offers no good benefit to the affected Arizona residents but just the few who do appear to be lining themselves up to make bank with this Corridor plan.*

*I like the thought of using the existing I-10 through Tucson to I-19 using double-decking. I do not believe that this would cost as much or more than the corridor through the Avra Valley area. Bad decisions, bad mistakes make a lifetime scar that no turning back can undo.*

*I have lived in Tucson since 1977 and have actively participated many times through the years in the community development process and decisions.*

*STOP NOW and RETHINK this I-11 corridor and plan on then doing it the RIGHT way.*

*Thank you for your time and consideration.*

[REDACTED]



**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2016 4:33 PM  
**To:** I-11ADOTstudy  
**Subject:** [Fwd: What Comes After America, North America; Soveriegnity Takeover Through the Covers of CANAMEX]  
**Attachments:** Forwarded message - What Comes After America, North America; Soveriegnity Takeover Through the Covers of CANAMEX  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To Whom It May Concern,

I am HIGHLY against and reject the CANAMEX / 1-11 highway simply put because it is the backbone for the TPP trade partnership as a stealthy cloak and dagger sovereignty takeover of the United States to bring about the North American Union. If you wish to sell out you and your childrens' inheritable future for freedom to a handful of transnational corporations who wish to destroy the United States and its lawful Constitution then break ground and sell yourselves for 30 pieces of silver like Judas. Do the research, the TPP is classified and no one but elite bureaucrats know what is in it. Trust must be verified and the facts show we cannot trust the CANAMEX highway nor how it will bypass the United States placing us on an even playing field with trade. I am forwarding you a letter I sent to ALL Arizona state senators a while back regarding my concerns for building this highway. This highway's specific intention is to further globalize the United States and destroy its nationalism. Why are we wanting to go into a North American Union when tomorrow Britain will openly vote trying hard to get out of theirs in the Brixit. Only sheep get mislead by wolves, time to be sheepdogs and protect our own interests. Ask yourselves simply, which one are you?

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, May 25, 2016 5:53 PM  
**To:** I-11ADOTstudy  
**Subject:** 1-11 Corridor

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi, just wanted to give you my input on the proposed 1-11 corridor. I personally would rather have a light rail, although probably more expensive, it would eliminate having to drive a car, and I think people would prefer to hop on a train instead of driving. Imagine one day just waking up and say, hey lets take the train north to Vegas for the day, or spend the night, do some gambling and or drinking, and not have to worry about getting busted for DUI. A freeway would have to be 2 lanes north and 2 lanes south, without having to take a chance on passing another vehicle and getting hit head on.

If a light rail were in the mix, then have a couple Quik Trips (QT) along the way, so the train could stop, let passengers off, take a bathroom break, or get something to eat or drink...(they would allow a drink, and QT would give them a seal proof container), then the train would continue on....(you could charge passengers \$50 to ride round trip) which is about what you would pay to drive to and from.

I know, a lot of track to install and trains to be constructed. And a freeway would still have the same construction, and they could use old tires for the rubberized asphalt

Thanks for reading (only my 2 cents worth).

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 4:53 PM  
**To:** I-11ADOTstudy  
**Subject:** ADOT STUDY

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Madam/Sir

I am a realtor of Tonopah.

I would like to put forward my suggestion that West valley boundary line of the study area would tremendously prove to be helpful to the west valley residents as there is no north south freeway farther west.

--

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Tuesday, June 21, 2016 10:23 PM  
**To:** I-11ADOTstudy; mkies@azdot.gov  
**Subject:** Alternative Interstate 11 Corridor to Mexico  
**Attachments:** I-11 AZ Route.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Greetings, I-11 Corridor Study Contacts:

I have created a proposal for an alternative I-11 corridor between Wickenburg and the Mexico Border that you may find interesting.

It addresses congestion due to increased trade while also discussing how more tourism to Mexico will benefit the Arizona economy.

Please see the attachment for my presentation slides which are very brief and to the point.

Thanks again for your time and attention and feel free to share this information with anyone else who may find interest in this.

[REDACTED]



## Alternative Interstate 11 Corridor From Wickenburg to Mexico Border



Prepared by:

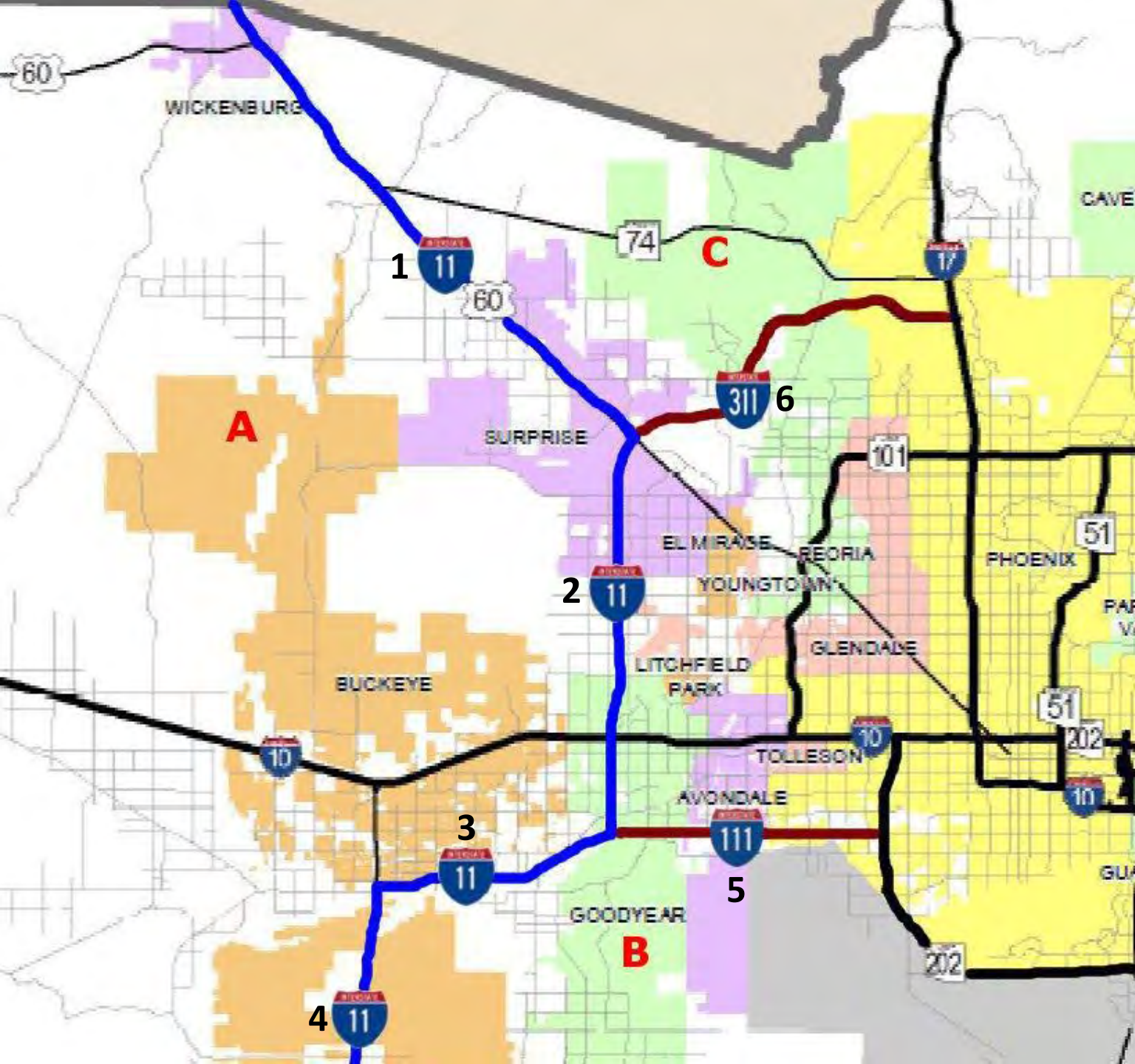






## Summary / Overview of Proposed I-11 Corridor

- I-11 still replaces the existing US 93 corridor but a new corridor south of Wickenburg is proposed.
- I-11 corridor uses existing highway contours with no urban sprawl and no new desert destruction.
- I-11 provides quicker and safer travel to Lukeville border crossing and subsequently to Rocky Point.
- I-11 between I-10 and I-8 becomes a southern bypass around Phoenix for I-10 through traffic.
- I-11 is an alternate to I-19 for some truck traffic and reduces congestion from Nogales to Tucson.
- I-11 generates additional sales tax revenues from vacationers for state and local governments in AZ.



## Phoenix West Valley I-11 Corridor (see map)

- 1) I-11 shares US 60 from Wickenburg to L303.
- 2) I-11 replaces Loop 303 from US 60 to SR 30.
- 3) I-11 replaces SR 30 from Loop 303 to SR 85.
- 4) I-11 replaces SR 85 from SR 30 to Gila Bend.
- 5) I-111 replaces SR 30 from Loop 303 to L202.
- 6) I-311 replaces Loop 303 from US 60 to I-17.

- A) DO NOT put I-11 west of White Tank Mtns.  
B) DO NOT extend Loop 303 south of SR 30.  
C) DO NOT convert SR 74 into a freeway.

**The above reallocations plus the transportation sales tax results in Maricopa County paying for the I-11 freeway from Wickenburg to Gila Bend.**

**This new I-11 corridor provides better utilization of sparsely populated freeways while saving the environment from construction of new corridors.**

**West Valley cities embrace the I-11 brand as its regional identity and for the auxiliary freeways.**

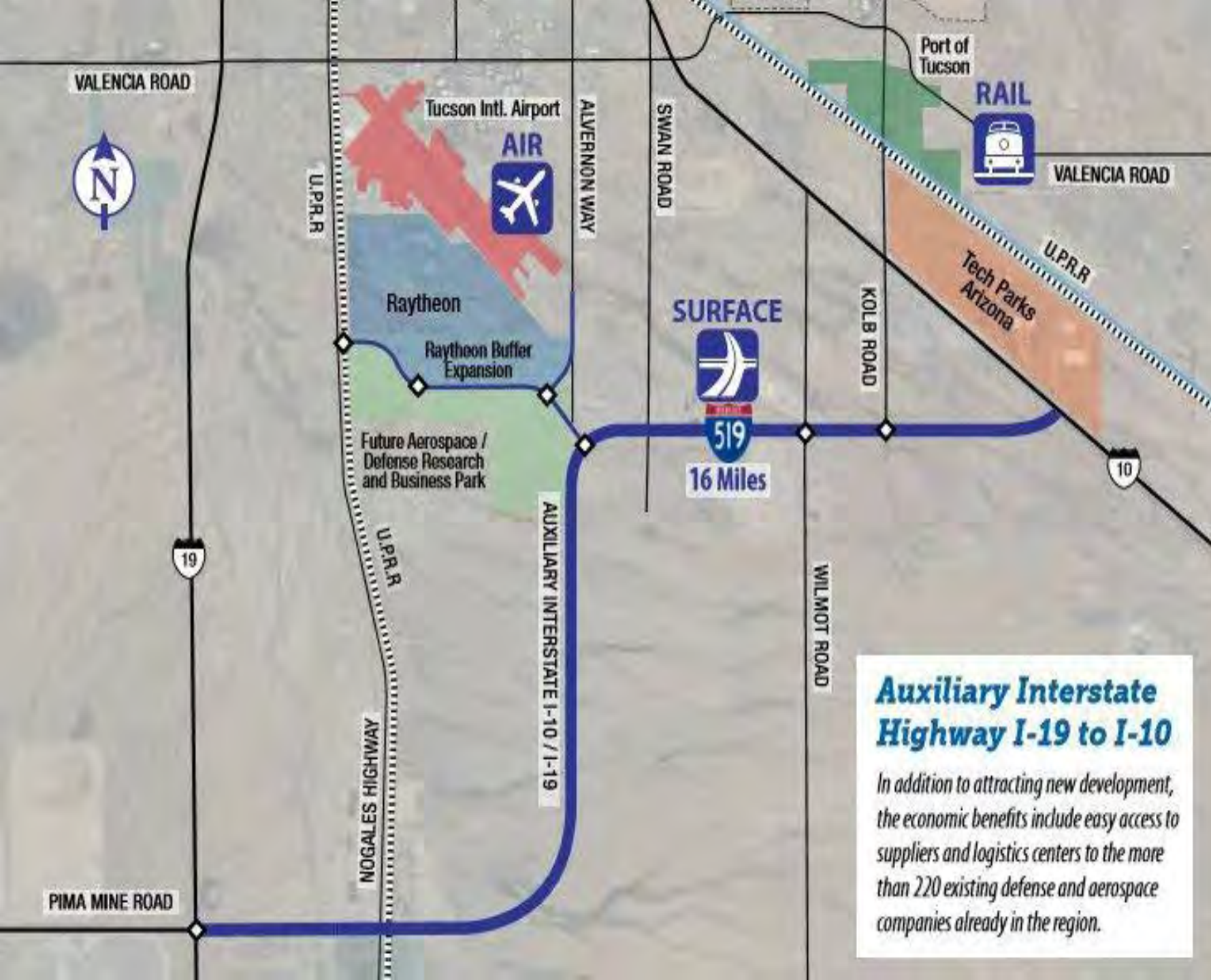




## Central Arizona I-11 Corridor

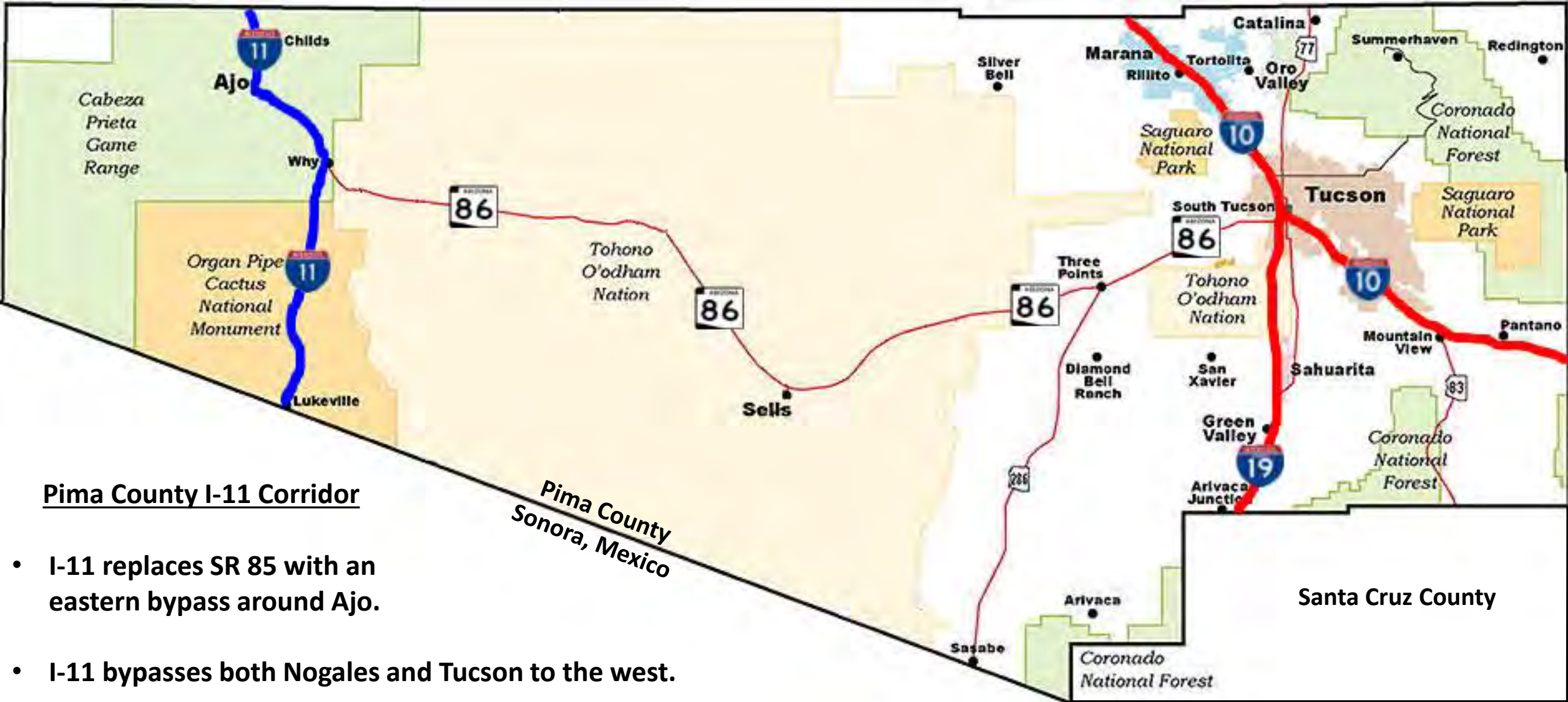
- I-11 replaces SR 85 and connects directly with I-8 near Gila Bend.
- Gila Bend serves as a gateway between I-11 and Pinal County with I-8 being the main linkage.
- I-10 west traffic to Los Angeles and Las Vegas can take I-8 and I-11 to bypass the Phoenix area.
- I-11 is an alternative to I-19 for travel between Hermosillo and Phoenix, Las Vegas, Los Angeles.
- I-11 does not enter Pinal County but a new North-South freeway is still planned for Pinal County.





## Tucson Metropolitan Region

- No western bypass between I-19 and I-10 through the Avra Valley.
- I-10 is widened in Tucson west of I-19 to contain extra truck traffic.
- I-10 double stacking could carry express trucks and buses with a potential bus-only transit ramp connecting Downtown Tucson.
- An auxiliary freeway connecting I-19 to I-10 provides faster travel between Nogales & New Mexico. (See map on the left for details).
- Tucson embraces the I-19 brand for its auxiliary interstate label.



### Pima County I-11 Corridor

- I-11 replaces SR 85 with an eastern bypass around Ajo.
- I-11 bypasses both Nogales and Tucson to the west.
- Pima County and Tohono O'odham Nation jointly finance the widening of SR 86 into a four-lane, divided highway with a northern bypass around Sells.
- Lukeville border station is expanded to accommodate increased vehicle traffic.





## South of the Border Connectivity (Refer to map for colored arrows)

- **Arrow:** A travel corridor to and from Guaymas and Mexico City.
- **Arrow:** Nogales is the dominant border crossing and offers direct access to Tucson & Pinal County.
- **Arrow:** A path to western border crossings for access to Gila Bend, Yuma, and Southern California.
- **Arrow:** Sonoyta is a secondary crossing from Hermosillo to reach Phoenix and Las Vegas. It also is a suitable alternative to Mexicali to reach Los Angeles. Sonoyta is the gateway from AZ to Rocky Point.
- **Arrow:** Yuma traffic crosses at San Luis; San Diego traffic may otherwise enter Baja California.

# Las Vegas Tourists

- Visitors from around the world travel to Las Vegas as a vacation and entertainment destination. However, Las Vegas is missing an ocean and a beach; there is no substitute for an oceanic beach.
- Many Vegas tourists take day trips to the Grand Canyon; another day trip can occur to the beach. Rocky Point, informally known as *Arizona's Beach* can be shared with Vegas as *Las Vegas' Beach*.
- Rocky Point is further away but it has less congestion, cheaper prices, and warmer waters versus Southern CA and it bundles well within a Vegas vacation; SOCAL is viewed as a separate vacation.
- A caravan of rental cars, chartered buses, and personal vehicles traveling between Las Vegas and Rocky Point provides sales tax opportunities such as eating at a restaurant or shopping at a mall.
- The accumulation of sales tax revenue can be significant for local, county, and state governments. Adding a side trip to nearby AZ locations within a Rocky Point day trip provides multiplier effects.

Las Vegas beach goers can choose Rocky Point instead of Southern California.



It's raining dollars in the Arizona Desert from out-of-state visitors and tourists.

## Arizona Tourism

- Arizona has many natural wonders, including Sedona and the Grand Canyon that tourists visit in a day trip. Likewise, these tourists can make another day trip to visit Rocky Point.
- An extra vacation day (or a repeat vacation) to Rocky Point creates multiplier effects to the AZ economy resulting in longer hotel stays and greater spending at stores, restaurants, etc.
- However, these economic benefits are not fully realized unless roadway improvements are made. Interstate 11 reduces travel time, increases safety, and serves as a direct connector.
- Increasing tourism to Sonora (including Rocky Point) strengthens the symbiotic relationship between Arizona and Sonora and through reciprocity, Sonora increases its trade to Arizona.
- I-11 between Mexico and Gila Bend carries some freight traffic and offers congestion relief from I-19 & I-10 while I-11 in the West Valley has access to manufacturing and distribution.





**From:** [REDACTED]  
**Sent:** Monday, June 06, 2016 3:27 PM  
**To:** I-11ADOTstudy  
**Subject:** Avra Valley Proposed Route

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir/Madam,

I live in a subdivision at Anway Road and Manville Road. In looking at the map for the proposed I11 route through Avra Valley, it looks as if this interstate will go right through our subdivision. I'm assuming if this is the case that we will have our houses purchased through eminent domain. I would like to know the timeframe for this process. My husband and I are currently exploring the thought of selling our home. However, with the proposed path of the interstate coming through our subdivision; I'm sure it would be difficult to sell. Of course, if we are only talking about a couple of years until the state buys our home we would probably try to wait. In looking at the on-line information it really doesn't give me any idea how long this process takes.

Please give me a timeframe and verify I'm correct in my assumption about it coming through our subdivision. The subdivision is called Tucson Avra West and I live at [REDACTED]  
[REDACTED]

Thanks,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, July 08, 2016 3:54 PM  
**To:** I-11ADOTstudy  
**Cc:** [REDACTED]  
**Subject:** CLLC and Wildlands Comments on I-11 Corridor EIS (Arizona)  
**Attachments:** CLLC & WN I-11 Scoping Comments FINAL.pdf  
  
**Importance:** High  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir/Madam,

The Center for Large Landscape Conservation and Wildlands Network submit the attached comments regarding assessment of harmful environmental impacts likely to arise from the proposed Interstate 11 (I-11) Corridor between Nogales and Wickenburg, Arizona (Project).

We respectfully request that the Federal Highway Administration and Arizona Department of Transportation review and consider the highway and connectivity data, studies and resources described in our letter during assessment of the likely effects of the I-11 Project on ecological connectivity in general in the region and, in particular, within the wildlife linkages identified in Table 1 of the comments. Where such impacts are unavoidable, we respectfully urge the agencies to determine opportunities to integrate wildlife-related mitigation measures as early as possible during planning for the Project.

Please do not hesitate to contact me if you have any questions or would like to further discuss these comments.

Best regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

July 8, 2016

*Via email: I-11ADOTStudy@hdrinc.com*

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

*Re: Tier 1 Environmental Impact Statement for Interstate 11 Corridor between  
Nogales and Wickenburg, Arizona*

Dear Sir/Madam,

The Center for Large Landscape Conservation and Wildlands Network submit the following comments regarding assessment of harmful environmental impacts likely to arise from the proposed Interstate 11 (I-11) Corridor between Nogales and Wickenburg, Arizona (Project).

As detailed below, we respectfully request that the Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) review and consider the highway and connectivity data, studies and resources described in this letter during assessment of the likely effects of the I-11 Project on ecological connectivity in general in the region and, in particular, within the wildlife linkages identified in Table 1 below. Where such impacts are unavoidable, the agencies should determine opportunities to integrate wildlife-related mitigation measures as early as possible during planning for the Project. As part of that inquiry, it is imperative that the agencies allocate adequate funding to cover estimated costs associated with such measures. In the event FHWA and ADOT are unable to estimate Project-specific costs of wildlife-related mitigation during the early stages of Project planning, we ask that you add an across-the-board 15% budget adjustment for the Project as a reasonable “placeholder” estimate of required mitigation costs, pending an itemized cost estimate.

Such action would be consistent with ADOT’s long-term vision of “Zero fatalities on Arizona roads” by 2050 and its 2014 Strategic Highway Safety Plan, which calls for ADOT to “implement comprehensive infrastructure improvements and maintenance to separate animals from the roadway while improving and maintaining wildlife connectivity.”<sup>1</sup> Doing so would also be consistent with FHWA policy calling for early consideration of wildlife during project planning as well as the President’s recent memorandum directing federal agencies to ensure their mitigation policies establish “a net benefit goal or, at a minimum, a no net loss goal for natural resources the agency manages that are important, scarce, or sensitive, or wherever doing so is consistent with agency mission and established natural resource objectives.”<sup>2</sup>

---

<sup>1</sup> Arizona 2014 Strategic Highway Safety Plan, <http://azdot.gov/docs/default-source/about/az-shsp-report-121014-reduced.pdf?sfvrsn=2>

<sup>2</sup> <https://www.whitehouse.gov/the-press-office/2015/11/03/mitigating-impacts-natural-resources-development-and-encouraging-related>



## I. Trends and a recent review of wildlife-vehicle collisions in the U.S.

An estimated one to two million collisions between cars and large animals occur annually in the United States, resulting in hundreds of human deaths and more than 25,000 injuries, at a cost to Americans of over \$8 billion – *every single year* (Huijser *et al.* 2008). Moreover, although the overall number of collisions has leveled off at around 6 million per year during the most recent study period (1990-2004), the relative percentage of collisions involving animals increased by 50%, from fewer than 200,000 per year in 1990 to approximately 300,000 in 2004 – accounting for about 5% of all reported motor vehicle collisions.

Between vehicle repair costs, medical bills, towing fees, accident attendance costs, hunting value of road-killed game species, and more, the total costs for the average collision with a large ungulate in the United States and Canada have been estimated at over \$6,000 per deer or bighorn sheep, \$17,000 per elk, and \$30,000 per moose (in 2007 US\$) (Huijser *et al.* 2009). In addition to endangering Arizonans, wildlife-vehicle collisions (WVCs) also constitute a major threat to survival for nineteen federally listed threatened or endangered animal species (Huijser *et al.* 2008).

More recent annual statistics confirm that WVCs continue to be a significant concern for transportation agencies. In its annual reports on traffic safety, the National Highway Traffic Safety Administration (NHTSA) combines information from two different databases to provide descriptive statistics about traffic crashes across the nation. The Fatality Reporting System (FARS) was started in 1975 and records the most severe traffic crashes, those in which someone was killed. The second source is the National Automotive Sampling System General Estimates System (GES), which was launched in 1988. GES contains data from a nationally representative sample of police-reported crashes of all severities, including those that result in death, injury, or property damage.

From NHTSA's 2012 annual report of traffic safety data (NHTSA 2014), Table 29 describes various collisions (*i.e.*, with other vehicles, poles, pedestrians) and non-collisions (*i.e.*, roll overs) that are described as the “first harmful event.” The table describes over 16 different types of harmful events. The table includes the category of crashes with animals of which there were approximately 271,000 – approximately 5% – in 2012. Of the sixteen categories of causes of potential first event crashes, animals ranked as the 5<sup>th</sup> most numerous type, after crashes with other vehicles (rear-end, side swipe, angle) and crashes with parked vehicles. Crashes such as head-on collisions with other vehicles (2.2%), rollovers (2%), or due to poles (3.2%), culverts/ditches (3.2%) or embankments (0.8%) were all lower than animal-vehicle collisions. Other reports (2000, 2005, 2010) along with the 2012 data are summarized in Table A. **While overall crashes have decreased from 6.4 million in 2000 to 5.6 million in 2012, animal-vehicle collisions increased over that same period, from 258,000 to 271,000.**

Table A: Animal-vehicle collisions, severity, and total collisions in the United States, 2000, 2005, 2010, 2012.

First Harmful Event Type	Year	Crash Severity						Total Animal		Total First Harmful Events
		Fatal		Injury		Property Damage Only				
		Number	Percent	Number	Percent	Number	Percent	Number	Percent	
Animal	2012	171	0.6	13,000	0.8	258,000	6.5	271,000	4.8	5,615,000
Animal	2010	203	0.7	14,000	0.9	254,000	6.6	268,000	5.0	5,419,000
Animal	2005	174	0.4	15,000	0.8	260,000	6.0	275,000	4.5	6,024,000
Animal	2000	143	0.4	14,000	0.7	244,000	5.7	258,000	4.0	6,394,000

### Citations:

Blincoe, L. J., Miller, T. R., Zaloshnja, E., and B.A. Lawrence. 2014. The economic and societal impact of motor vehicle crashes, 2010, Report No. DOT HS 812 013. National Highway Traffic Safety Administration, Washington, D.C.

Huijser, M.P., J.W. Duffield, A.P. Clevenger, R.J. Ament, and P.T. McGowen. Cost-Benefit Analyses of Mitigation Measures Aimed at Reducing Collisions with Large Ungulates in the United States and Canada: a Decision Support Tool. Ecology and Society, Vol. 14, No. 2, Article 15, 2009. URL: <http://www.ecologyandsociety.org/vol14/iss2/art15/>

Huijser, M.P., P. McGowen, J. Fuller, A. Hardy, A. Kociolek, A.P. Clevenger, D. Smith & R. Ament. 2008. Wildlife-vehicle collision reduction study. Report to congress. U.S. Department of Transportation, Federal Highway Administration, Washington D.C., USA, available at: [ftp://ftp.odot.state.or.us/techserv/ORWildlifeMoveStrategy/WildlifeConnectionsConference/Wildlife\\_Vehicle\\_Collision\\_Reduction\\_report\\_to\\_Congress.pdf](ftp://ftp.odot.state.or.us/techserv/ORWildlifeMoveStrategy/WildlifeConnectionsConference/Wildlife_Vehicle_Collision_Reduction_report_to_Congress.pdf)

NHTSA (National Highway Traffic Safety Administration). 2014a. Traffic safety facts: 2012. A compilation of motor vehicle crash data from the Fatality Analysis Reporting System and the General Estimates System, Report No. DOT HS 812 032. National Highway Traffic Safety Administration, National Center for Statistics and Analysis, U.S. Department of Transportation, Washington, DC. Online at: <http://www-nrd.nhtsa.dot.gov/Pubs/812032.pdf>

NHTSA (National Highway Traffic Safety Administration). 2012. Traffic safety facts: 2010. A compilation of motor vehicle crash data from the Fatality Analysis Reporting System and the General Estimates System, Report No. DOT HS 811 659. National Highway Traffic Safety Administration, National Center for Statistics and Analysis, U.S. Department of Transportation, Washington, D.C. Online at: <http://www-nrd.nhtsa.dot.gov/Pubs/811659.pdf>

NHTSA (National Highway Traffic Safety Administration). 2006. Traffic safety facts: 2005. A compilation of motor vehicle crash data from the Fatality Analysis Reporting System and the General Estimates System, Report No. DOT HS 810 631. National Highway Traffic Safety Administration, National Center for Statistics and Analysis, U.S. Department of Transportation, Washington, DC. Online at: <http://www-nrd.nhtsa.dot.gov/Pubs/810631.pdf>

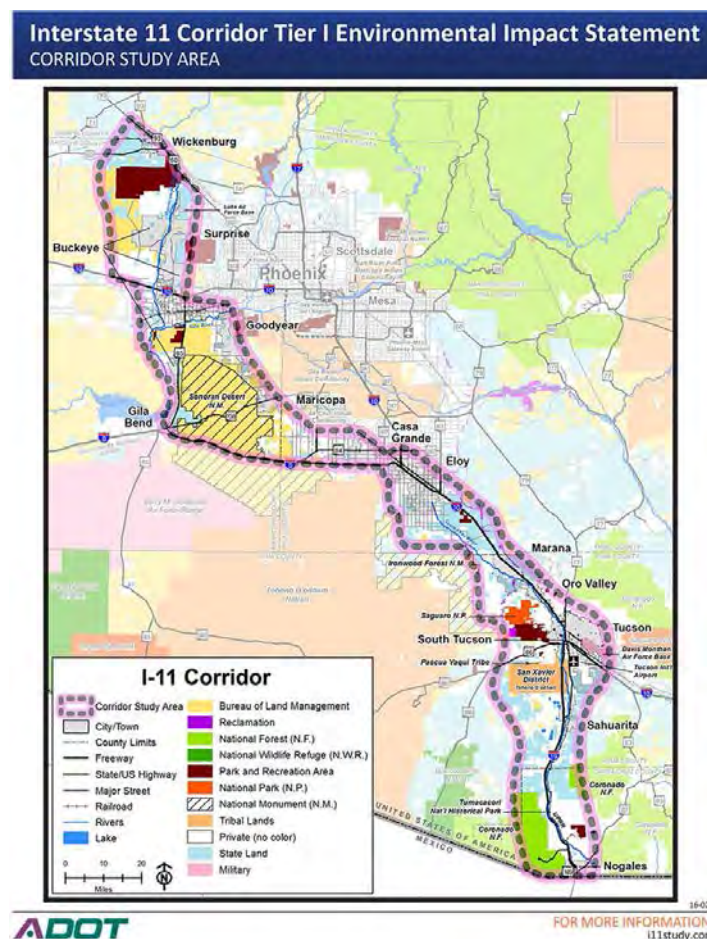
NHTSA (National Highway Traffic Safety Administration). 2000. Traffic safety facts: 2000. A compilation of motor vehicle crash data from the Fatality Analysis Reporting System and the General Estimates System, Report No. DOT HS 809 337. National Highway Traffic Safety Administration, National Center for Statistics and Analysis, U.S. Department of Transportation, Washington, DC. Online at: <http://www-nrd.nhtsa.dot.gov/Pubs/TSF2000.pdf>

Although overall 2012 fatalities (171 fatalities, 0.6%) and injuries (13,000 injuries, 0.8%) due to collisions with animals remain below 1%, of the total crashes resulting in property damage, 6.5% involve animals. The only other categories in the table to exceed 6.5% in the property-damage-only type crashes are collisions with other vehicles (rear-end, side swipe, and angle). Moreover, property-damage only crashes are notoriously under-reported; indeed, it has been estimated that well over half (60%) of property-damage-only crashes and almost a quarter (24%) of all injury crashes are not reported to the police (Blincoe *et al.* 2014).

Despite these grim statistics, the percentage of highway safety program dollars being spent to address WVCs nationwide and in Arizona continues to be significantly less than the percentage (~5%) of all reported motor-vehicle collisions involving wildlife.

## II. Arizona Wildlife Linkage Assessment

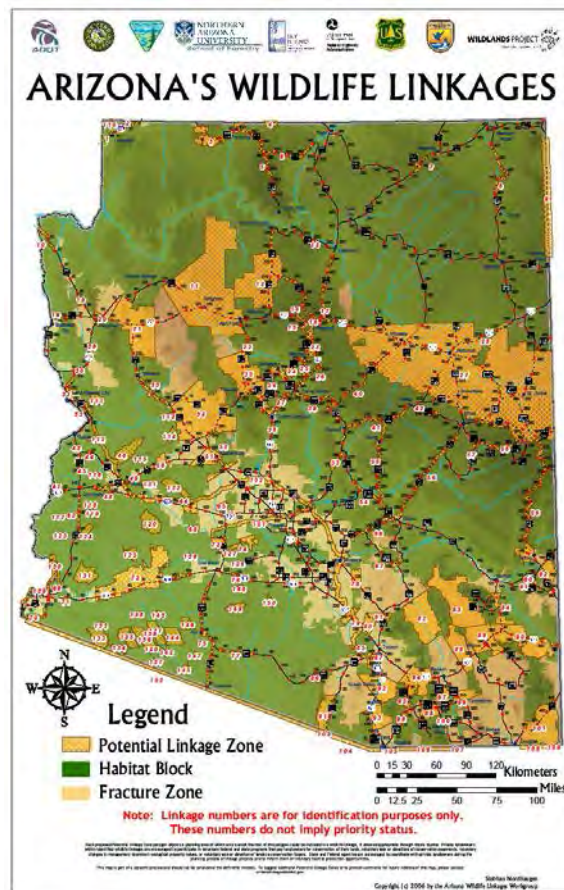
As depicted in Figure 1, the I-11 Project study area runs from Nogales to Wickenburg. This study area forms the southern section of a proposed corridor that ultimately will connect key metropolitan areas and markets in Arizona with Mexico and Canada. The Project study area traverses four counties (Maricopa, Pinal, Pima and Santa Cruz) and is 280 miles long.



**Figure 1.** Map of I-11 Corridor Study Area, available online: <http://www.i11study.com/Arizona/study-area.asp>

The purpose of this proceeding is to identify potential environmental impacts of the proposed Project and to assess how to structure the Project to avoid (or, if unavoidable, minimize) such effects. To fulfill this purpose, we respectfully urge FHWA and ADOT to review the identified linkages and associated recommendations of the Arizona Wildlife Linkage Assessment (AWLA), available online at: <http://azdot.gov/business/environmental-planning/programs/wildlife-linkages>. Authored by the Arizona Wildlife Linkages Workgroup, the AWLA is “a collaborative effort formed by the Arizona Department of Transportation, Arizona Game and Fish Department, Bureau of Land Management, Federal Highway Administration, Northern Arizona University, Sky Island Alliance, USDA Forest Service, U.S. Fish and Wildlife Service and the Wildlands Project to address habitat fragmentation through a cohesive, systematic approach.”<sup>3</sup> Relying on a series of statewide workshops that gathered local experts, the assessment catalogues:

1. large blocks of protected habitat;
2. wildlife movement corridors (potential linkage zones); and
3. factors threatening to disrupt such linkage zones.



**Figure 2.** Map of Arizona’s Priority Wildlife Linkages, available online: <http://azdot.gov/docs/maps/arizona's-wildlife-linkages-map.pdf?sfvrsn=0>

<sup>3</sup> <https://trid.trb.org/view.aspx?id=1349678>

As shown in Figure 2, the AWLA identified 152 priority wildlife linkage assessments throughout the state. Of those, at least 16 intersect the proposed I-11 Project, as detailed below in Table 1.

**Table 1:** AWLA Priority Wildlife Linkages that intersect with the I-11 Project.

<i>Linkage #</i>	<i>Linkage Name</i>	<i>Linkage/Road Intersection</i>
10	Mt. Tipton - Mt. Perkins	U.S. 93
18	Black Mts. - Cerbat Mts.	U.S. 93
20	Hualapai Mts. - Cerbat Mts.	U.S. 93
21	I-40-U.S. 93 - Kingman	U.S. 93
33	Hualapai Mts. - Bagdad	U.S. 93
113	Poachie Range - Black Mts.	U.S. 93
34	Tres Alamos Wilderness/Prescott NF	U.S. 93
51	Wickenburg	U.S. 93
152	Central Arizona Project Canal	U.S. 60
151	Gila-Salt River Corridor	I-10
73	Gila Bend Mts. - N. Maricopa Mts.	U.S. 85
76	S. Maricopa Mts. -Sand Tanks	I-8
79	Ironwood - Tortolita Mts.	I-10
80	Saguaro - Tortolita Mts.	I-10
92	San Xavier/Sierrita -Santa Rita	I-19
93	Tumacacori - Santa Rita	I-19

Although the I-11 project will largely follow existing roadways, it will nonetheless require substantial widening of those highways, thereby presenting opportunities to integrate wildlife overpasses, underpasses, and at-grade mitigation at points where priority wildlife linkages intersect the newly expanded roadways. Indeed, AWLA’s authors anticipated that the assessment would prove valuable for road-widening projects such as the one proposed here. Specifically, in AWLA’s section on “providing solutions,” the authors noted:

Loss of connectivity is by no means inevitable, and the outcome of human population growth does not have to result in a proliferation of barriers. Although road-widening projects generally increase vehicle traffic, this need not result in more wildlife/vehicle collisions, or a decrease in animal movements. *Road-widening projects present the greatest opportunity to provide crossing structures to accommodate wildlife movement.* Because most of Arizona’s roads were not originally designed to accommodate wildlife movement, current road improvement projects can dramatically restore permeability.... [as] human structures are eventually upgraded, creating opportunities to facilitate connectivity - planners and engineers involved must be aware of the need for connectivity within the project area early in the planning process. (*emphasis added*)

### III. West-wide and Arizona Crucial Habitat Assessment Tools

The Western Governors' Association has produced a west-wide Crucial Habitat Assessment Tool (CHAT) as part of its Wildlife Corridors and Crucial Habitat Initiative.<sup>4</sup> The CHAT is a cooperative effort of 16 Western states to provide the public and industry a high-level overview of "crucial habitat" across the West. "Crucial habitats" are places that are likely to provide the natural resources important to aquatic and terrestrial wildlife, including species of concern, as well as hunting and fishing species. The west-wide CHAT is intended to help users in the pre-planning of energy transmission routes, or in comparing fish and wildlife habitat, by establishing a common starting point across the West for the intersection of development and wildlife.

As part of the WGA's CHAT effort, connectivity among large intact blocks of habitat was modeled throughout the west. These models identify centrality flow lines, or corridor routes predicted to be crucial for maintaining broad-scale connectivity of several major biomes, including forested systems.<sup>5</sup> Each of these lines is buffered by 1 mile on each side to account for various sources of uncertainty in the model. Although this analysis was conducted throughout the West, individual states adopted it at their own discretion. Because some states selected alternative methods for modeling connectivity and many states chose not to make connectivity layers public via the CHAT, this layer is not available for download from the CHAT website. For download access, please direct questions concerning access to and use of this dataset to John Pierce (360.902.2511, [John.Pierce@dfw.wa.gov](mailto:John.Pierce@dfw.wa.gov))

In addition to the west-wide CHAT, Arizona also has a state-specific CHAT known as HapiMap™, <http://www.habimap.org/>. HapiMap is "intended to be used as an early planning tool for landscape-level analysis and should be used in concert with all available data and expertise to ensure project plans address wildlife and habitat conservation at all levels." In addition to wildlife linkages data, HabiMap also includes layers on Biotic Communities; Amphibian, Bird, Fish, Reptile, and Mammal Potential Distributions; Species of Concern; and Unfragmented Areas.<sup>6</sup>

We urge FHWA and ADOT to review these data sources as well to determine potential environmental impacts resulting from the proposed Project.

---

<sup>4</sup> In spring 2015, the Western Governors handed off oversight and management of CHAT to the Western Association of Fish and Wildlife Agencies (WAFWA) and Association of Fish and Wildlife Agencies (AFWA). The new name is the Western Association of Fish and Wildlife Agencies' Crucial Habitat Assessment Tool (WAFWA CHAT).

<sup>5</sup> Western Governors' Association. 2008. Wildlife corridors initiative: June 2008 report. Western Governors' Association. Denver, CO. Available on the internet: <http://www.westgov.org/wildlife>.

<sup>6</sup> Table 3 in Ament, R., A. Clevenger, A. Kociolek, T. Allen, M. Blank, R. Callahan, M. McClure, S. Williams. 2015. *Development of Sustainable Strategies Supporting Transportation Planning and Conservation Priorities Across the West*. A Report prepared for the Federal Highway Administration and Western Governors' Association. Washington, DC. 143 pp, <http://largelandscapes.org/media/publications/Development-of-Strategies-Supporting-Transportation-Planning-Across-West.pdf>



#### **IV. Providing safe passage is a win-win-win for Arizona and FHWA, as recognized by ADOT's long-term vision of "Zero Deaths" by 2050**

As projects undertaken by ADOT itself have demonstrated, there are proven solutions to the problem of WVCs: wildlife mitigation measures, including wildlife underpasses, overpasses, and systems that automatically detect wildlife nearby, with associated fencing and other elements, have been shown to reduce wildlife-vehicle collisions by 80 to 90%<sup>7</sup> – a reduction from 100 collisions to 20 or fewer. Despite their upfront costs, these measures have been shown to pay for themselves over time through collision cost savings when installed at collision hotspots (Huijser *et al.* 2009).

Inclusion of wildlife-related mitigation during transportation programs, plans and projects also will aid ADOT in meeting its goal of zero fatalities on Arizona's roadways. *Indeed, a commitment to sound and ongoing investment in wildlife-related mitigation is essential for ADOT to meet its goal of zero fatalities by 2050.*

In sum, taking steps to prevent collisions and provide safe passage is predicted to save human lives, wildlife, and money – *resulting in a win-win-win scenario.*

#### **V. Reviewing the identified data in these comments is consistent with Presidential and FHWA policy recommendations**

Avoiding or, if unavoidable, mitigating the effects of the proposed Project conforms to the spirit of the recent Presidential Memorandum regarding *"Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment"* (November 3, 2015).<sup>8</sup> That memorandum directs federal agencies to ensure that their mitigation policies establish "a net benefit goal or, at a minimum, a no net loss goal for natural resources the agency manages that are important, scarce, or sensitive, or wherever doing so is consistent with agency mission and established natural resource objectives." For impacts that cannot be avoided entirely, FHWA and ADOT should adhere to the three-part concept of mitigation – relying on avoidance, minimization, and compensation (with a preference for a ratio of greater than 1:1). In short, where harm results from agency action, compensatory mitigation is no longer at the agency's discretion; rather, it is now an affirmative national policy.

Considering the effect of the Project on wildlife early on is also consistent with the FHWA's June 1, 2010 memorandum regarding information and training on strategies to reduce WVCs (attached). In that memorandum, the FHWA urged all FHWA divisions to adopt the practice of incorporating *"consideration of wildlife and safety needs into . . . documentation checklists"* because *"early consideration can result in project design features that decrease wildlife mortality and increase safety for vehicle drivers and passengers"* (emphasis added, Attachment at 2). Following its own advice, we urge FHWA and ADOT to similarly incorporate wildlife-

---

<sup>7</sup> Woods, J.G. 1990. Effectiveness of fences and underpasses on the Trans-Canada highway and their impact on ungulate populations. Report to Banff National Park Warden Service, Banff, Alberta, Canada; Clevenger, A. P., B. Chruszcz, & K. Gunson. 2001. Highway mitigation fencing reduces wildlife-vehicle collisions. *Wildlife Society Bulletin*. 29:646–653; Dodd, N. L., J. W. Gagnon, S. Boe, A. Manzo, & R. E. Schweinsburg. 2007. Evaluation of measures to minimize wildlife-vehicle collisions and maintain permeability across highways: Arizona Route 260. Final Report 540. FHWA-AZ-07-540. Arizona Department of Transportation, Phoenix, Arizona, USA.

<sup>8</sup> <https://www.whitehouse.gov/the-press-office/2015/11/03/mitigating-impacts-natural-resources-development-and-encouraging-related>

vehicle mitigation strategies into its checklists and other planning documentation for the Project, to ensure that mitigation measures are considered early during planning and budgeting.

## **Conclusion**

Thank you for the opportunity to provide comments on the I-11 Project. We respectfully request that you consider the resources identified above during your examination of the potential environmental effects of the Project. If you have any questions regarding our comments or the information we have provided, please do not hesitate to contact us.

Respectfully submitted,

[REDACTED]

Center for Large Landscape Conservation

[REDACTED]

[REDACTED]

Wildlands Network

[REDACTED]

Attachment:

1. FHWA June 1, 2010 Memorandum



Attachment: FHWA June 1, 2010 Memorandum



# Memorandum

Subject: **INFORMATION:** FHWA Wildlife Vehicle Collision (WVC) Reduction Study Training Course

Date: June 1, 2010

In Reply Refer To: HEPE

[REDACTED]  
Associate Administrator for  
Office of Safety

[REDACTED]  
Associate Administrator for  
Planning, Environment, and Realty

To: Directors of Field Services  
Federal Lands Highway Division Engineers  
Division Administrators

The Office of Safety and the Office of Planning, Environment, and Realty wish to announce the availability of the FHWA Wildlife Vehicle Collision (WVC) Reduction Study Training Course. This course was developed by the Office of Safety Research and Development, the Office of Project Development and Environmental Review, and the Office of Federal Lands. The web-based course is now available at: <http://www.environment.fhwa.dot.gov/WVCtraining/index.asp>.

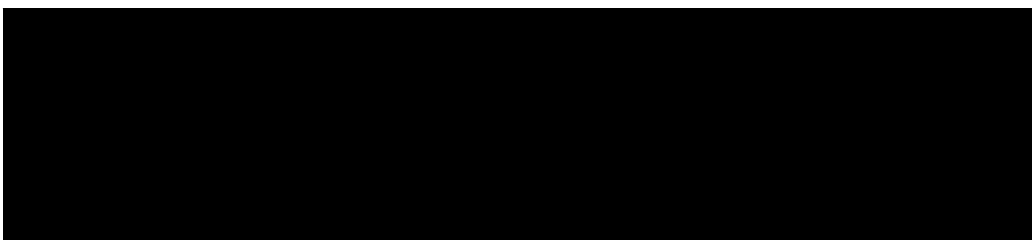
This training is based on the findings of the Wildlife Vehicle Collision Reduction Study: Report to Congress which is available at: <http://www.tfhr.gov/safety/pubs/08034/index.htm> and the Best Practices Manual developed from that study. The Manual, which is the textbook for the course, may be accessed at: <http://www.fhwa.dot.gov/environment/hconnect/wvc/index.htm>. The Report to Congress, Best Practices Manual, and the Web-based course were developed in collaboration with representatives from State DOT(s), other federal agencies, and experts in the field of Wildlife Vehicle Collisions. This collaborative effort resulted in a thorough and in-depth process to identify WVC problem areas and habitat connectivity opportunities, and to evaluate effective mitigation strategies that can be implemented to reduce WVCs. The course covers a wide variety of these strategies such as wildlife fencing, animal detection systems and vegetation management in great detail.

This web based course and the information it contains is particularly important at this time. The Congressional WVC study estimated that one to two million collisions between cars and large animals occur every year in the U.S. This presents a real danger to human safety as well as wildlife survival.



Though human injuries and fatalities as a result of WVCs are relatively rare, they do occur and are a serious consequence of WVCs. More common impacts for drivers and their passengers are vehicle damage, secondary motor vehicle crashes, emotional trauma, and less direct impacts such as travel delays. WVCs can also require the assistance of law enforcement personnel, emergency services, and road maintenance crews for potential repairs and carcass removal. For animals, WVCs present an immediate danger to their individual survival, and further reduce the population survival probability of certain threatened and endangered species.

The information presented in the Study, Manual and course is a useful tool in evaluating the need to accommodate wildlife collision mitigation strategies and connectivity needs during the environmental review process, regardless of the class of action of the environmental document. In addition to Environmental Assessments and Environmental Impact Statements, many Divisions and State DOTs have incorporated this consideration of wildlife and safety needs into their Categorical Exclusion and other documentation checklists. We encourage all divisions to adopt this practice since early consideration can result in project design features that decrease wildlife mortality and increase safety for vehicle drivers and passengers. In addition to the information resources outlined above, many states have collaborated with non-governmental organizations to develop regional and local information regarding wildlife corridors and connectivity priorities. We have attached a summary prepared by the Western Environmental Law Center of some of these studies and tools.



**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2016 2:20 PM  
**To:** I-11ADOTstudy  
**Subject:** Comment: Re: Southern Arizona hosts two more Interstate 11 public meetings

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

ADOT -- South of PHX, any 'new' improvements should be to I-10 & I-19, within the existing right-of-way. Arizonans don't need or want a new I-11 corridor in S AZ. The environmental impacts would be too harmful and cannot be adequately mitigated.

[REDACTED]  
[REDACTED]

On Wed, Jun 22, 2016 at 2:04 PM, Arizona Department of Transportation  
<[adot@service.govdelivery.com](mailto:adot@service.govdelivery.com)> wrote:

**ADOT**

SHARE



### Southern Arizona hosts two more Interstate 11 public meetings

The Arizona Department of Transportation is holding two more public meetings this week in southern Arizona as part of a three-year environmental study for the proposed Interstate 11.

The two meetings in Tucson and Marana are part of the public scoping process for a corridor stretching from Nogales to Wickenburg.

Participants will be able to meet and talk with members of the study team to ask questions, provide comments and stay involved. They'll also be able to view maps of the corridor study area and mark up those maps with their ideas and comments.

The meetings run from 4 to 6:30 p.m., with presentations beginning at approximately 4:15 p.m. The same information will be presented at each meeting. Earlier this month, meetings were held in Casa Grande and Buckeye. The final meeting will be held in Wickenburg.

Wednesday, June 22  
Arizona Riverpark Inn  
777 W. Cushing St.  
Tucson

Thursday, June 23  
Marana Middle School – Gymnasium  
11285 W. Grier Rd.  
Marana

Wednesday, June 29  
Wickenburg Community Center  
160 N. Valentine St.  
Wickenburg

Planned as much more than a highway, I-11 is envisioned as a multimodal corridor connecting Arizona with regional and international markets while opening up new opportunities for mobility, trade, job growth and economic competitiveness.

The recommended I-11 corridor would likely follow US 93 from the Hoover Dam bypass bridge south to Wickenburg. The 280-mile corridor that is the focus of the current environmental study begins in Wickenburg and runs west of the Phoenix metropolitan area and then south to the Tucson area and then Nogales.

The current 45-day comment period allows Arizonans to provide input on the I-11 study area. It's an opportunity to ask questions and share comments about topics such as potential locations for the I-11 corridor, environmental considerations, impact on wildlife habitats or cultural resources, and possible opportunities for other transportation modes, such as rail, that may be considered.

Those interested in commenting on the study but who are unable to attend a public meeting are encouraged to visit the study website at [i11study.com/Arizona](http://i11study.com/Arizona) and complete an online survey. All feedback, questions and comments will be considered part of the study, are entered into the project record and will help shape the proposed I-11 corridor. The public comment period runs until July 8.

In March, ADOT, in partnership with the Federal Highway Administration, launched the three-year study. It began with a process called pre-scoping that included meetings with federal, state and local governments, resource agencies and planning organizations within the study corridor.

During the next three years, ADOT will develop an Alternatives Selection Report to assess a wide range of corridor alternatives and options, along with opportunities and constraints. A Draft Tier 1 Environmental Impact Statement will evaluate in greater detail a smaller number of corridor alternatives, including segments that may advance as independent improvements or projects. There will be a no-build alternative as well.

Input from the public, communities and other stakeholders will contribute to these two reports, as well as a Final Tier 1 Environmental Impact Statement that will list a selected corridor alternative.

In November 2014, the Arizona and Nevada departments of transportation completed a two-year feasibility study as the first step in the Interstate 11 process. In December 2015, Congress formally designated Interstate 11 from north to south in Arizona through the Fixing America's Surface Transportation Act. While the designation doesn't include funding, it does make the corridor eligible for federal funding in the future.

The public, communities and other stakeholders will have opportunities to comment through regular meetings, community events and other forums throughout the course of the three-year study. Right now, comments can be sent to:

- Online survey: [i11study.com/Arizona/](http://i11study.com/Arizona/)
- Email: [I-11ADOTStudy@hdrinc.com](mailto:I-11ADOTStudy@hdrinc.com)
- Toll-free bilingual telephone hotline: [1-844-544-8049](tel:1-844-544-8049)
- Mail:

Interstate 11 Tier 1 EIS Study Team

c/o ADOT Communications  
1655 W. Jackson St., Mail Drop 126F  
Phoenix, AZ 85007

For more information about the I-11 study, visit [i11study.com/Arizona](http://i11study.com/Arizona).

---

Monsoon season has arrived in Arizona. Don't drive into dust storms. Remember, [Pull Aside, Stay Alive](#).

SUBSCRIBER SERVICES:

[Manage Preferences](#) | [Delete Profile](#) | [Help](#)

For more information, visit [azdot.gov](http://azdot.gov)

---

Sent on behalf of ADOT by GovDelivery, Inc. • 206 S. 17th Ave • Phoenix, AZ 85007 • [602.712.7355](tel:602.712.7355)



**From:** [REDACTED]  
**Sent:** Tuesday, June 28, 2016 1:16 PM  
**To:** I-11ADOTstudy  
**Subject:** Comment for Scoping of the Tier 1 Environmental Impact Statement for Interstate 11

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Dear sirs,

I submit this comment for your consideration in scoping of the Tier 1 Environmental Impact Statement for Interstate 11 Corridor Between Nogales and Wickenburg, Arizona, as set forth in the Notice of Intent published on 5/20/2016.

I believe that a corridor alignment west of the Tucson Mountains, through Avra Valley, has significant negative impacts that make it less preferable than options for widening or double-decking I-10 east of the Tucson Mountains. I recommend that the following impacts be considered in evaluating alternative corridors, and that they be discussed in the Environmental Impact Statement.

Proximity to Public Lands:

A corridor alignment in Avra Valley would place the highway in close proximity to a number of lands that have special significance to the public. West of Avra Valley are Ironwood Forest National Monument and the Tohono O'odham Nation. East of Avra Valley are the Tucson Mountain District of Saguaro National Park, the Tucson Mountain County Park, and the Arizona Sonora Desert Museum. An Avra Valley alignment would pass between the east and west portions of these lands. The space is especially restricted just south of Mile Wide road where Saguaro National Park is only 1.5 miles from the Tohono O'odham Nation and is only 2.3 miles from Ironwood Forest National Monument. This leaves a very narrow space for location of a highway.

Bisecting these lands with a heavily used transportation corridor would have a negative impact on the experience sought by visitors, including scenery, lack of noise, wildlife, and natural character. These are qualities that make Tucson an attractive tourist destination, and provide Tucson residents with a valuable urban wilderness experience.

Effect on Wildlife Movement:

With a relatively sparse human population, Avra Valley presently has relatively little impediment to east-west wildlife travel. As an example, over the past few months bighorn sheep from Ironwood Forest have been sighted at numerous places in the Tucson Mountains. An Avra Valley alignment of I-11 would have a serious impact on such wildlife movement, and could lead to inbreeding of wildlife in the Tucson Mountains, trapped between Tucson on one side and the I-11 highway on the other side. To mitigate this impact, the design of any major highway through Avra Valley must include wildlife crossings, including underpasses and overpasses, over the approximately 10 to 15 mile extent of the Tucson Mountains.

Thank you for considering these comments, and please let me know if you require any

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

.



Virus-free. [www.avast.com](https://www.avast.com)



**From:** [REDACTED]  
**Sent:** Friday, July 08, 2016 11:42 AM  
**To:** I-11ADOTstudy  
**Cc:** [REDACTED]  
**Subject:** Comment for Scoping of the Tier 1 Environmental Impact Statement for Interstate 11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sirs,

The Friends of Ironwood Forest, a conservation group composed of over 900 individuals and families supporting the Ironwood Forest National Monument near Tucson, strongly opposes the proposed route of I-11 through Avra Valley, as it represents a significant threat to a significant and unique desert ecosystem, flora and fauna populations.

The negative impact caused by this project would extend far beyond the proposed construction sites. The resulting vehicle emissions, roadway runoff, light and noise pollution, soil and water degradation will disrupt not only the wildlife, but also decrease the quality of life for human residents and visitors for miles on either side. The project would negatively impact the Arizona-Sonora Desert Museum and Saguaro National Park West, two of the most important and well-loved tourist destinations of Pima County, both directly through the destruction of neighboring habitat and indirectly by accelerating encroaching commercial development. In addition, the proposed I-11 route would adversely affect the natural and cultural resources protected within the U.S. Bureau of Reclamation's Wildlife Mitigation Corridor, the Tohono O'odham Nation, and Ironwood Forest National Monument. Additionally, the Avra Valley route would greatly facilitate the spread of invasive plant species, like buffelgrass and Sahara mustard, throughout these protected areas.

The proposed route of I-11 would present a formidable barrier to wildlife populations in the protected habitats on either side. Recent sighting of bighorn sheep in the Tucson Mountains and SNPW that have roamed from the Ironwood Forest herd are dramatic evidence of wildlife recovery and expansion. Without a wildlife corridor, habitats on either side of the interstate may be too small or too degraded to sustain viable populations of indigenous plants and animals. Additionally, reduced connectivity threatens these populations by exposing them to greater inbreeding, reduced genetic diversity and increased disease risk.

Expansions of the existing I-10 and I-19 infrastructure would be a more appropriate way of boosting the economic development of Pima County and alleviating current and growing congestion problems on the region's interstate routes. Such a project, along an existing thoroughfare, would likely pose no major new risk to the Sonoran desert's wildlife habitats and precious public lands.

Thank you for your consideration.

Friends of the Ironwood Forest

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, July 08, 2016 8:49 AM  
**To:** I-11ADOTstudy  
**Subject:** COMMENT on I-11 alignment

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[REDACTED]  
[REDACTED] 9  
July 7, 2016

Re: Scoping Interstate 11 Tier 1 Environmental Impact Statement (EIS), Nogales to Wickenburg

I-11 Study Participants:

I am writing to comment on the I-11 study, because I strongly object to the use of any part of Avra Valley for this new freeway. I've been living in the Tucson area since 1969, and spent years living in the unique and peaceful Avra Valley west of town.

Avra Valley is surrounded by important and biologically rich areas. Any alignments considered in Avra Valley would have a negative impact on Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, Tortolita Mountain Park, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and planned mitigation lands for Habitat Conservation Plans (HCPs) under development by the City of Tucson, Pima County, and the Town of Marana. There would also be negative impacts on hundreds of ancient archaeology sites, the desert bighorn sheep, deer, mountain lions, and more.

Reduced ecological values due to the effects of fragmentation by any proposed infrastructure developments, including highways, should be avoided to the greatest extent possible. In Pima County, an Interstate 11 alignment through Avra Valley would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally recognized regional conservation plan developed and implemented over the last 18 years, also identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The federal Bureau of Reclamation established a Wildlife Mitigation Corridor when the CAP canal was built.

The Arizona Wildlife Linkages Workgroup, spearheaded by the Arizona Department of Transportation and AzGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. And most recently, AzGFD's Coalition for Sonoran Desert Protection 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote/Ironwood-Tucson Wildlife

Linkage Design, including large swaths of land in Avra Valley. Any Interstate 11 alternatives that are located in Avra Valley would also sever the Ironwood-Picacho wildlife linkage. The study area encompasses a highly threatened wildlife linkage between the Tucson and Tortolita Mountains and skirts the edge of another highly threatened wildlife linkage between the Tortolita and Santa Catalina Mountains.

Severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature such as a new highway, severing an important movement area for wildlife, cannot be adequately mitigated off-site.

The EIS should fully outline impacts to riparian habitat within the study area. Any possible Interstate 11 alignments through unincorporated Pima County would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest region are dependent on riparian areas for at least part of their life cycle.

Any freeway alignments through Avra Valley would also dramatically increase accessibility and encourage commercial and residential development. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs, and force major changes to existing land use and zoning designations. Existing land use plans have identified the areas most appropriate for growth and any new transportation corridors should be appropriately sited within those existing growth areas.

An Avra Valley I-11 route is in violation of the Board of Supervisors' own policy. In BOS Resolution 2007-343, Pima County policy stated: "NOW, THEREFORE BE IT RESOLVED that the Pima County Board of Supervisors opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological and urban form impacts could not be adequately mitigated."

I, and many others, question the need for a new interstate between Nogales and Wickenburg at all.

Improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best minimize environmental impacts.

If you are going to build it, I urge you to leave Avra Valley out of your plans.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]

**Sent:** Tuesday, June 14, 2016 3:56 PM

**To:** I-11ADOTstudy

**Subject:** comment on I-11

**Follow Up Flag:** Follow up

**Flag Status:** Completed

Comment: The locations for the interchanges should be set to minimize any increase in commute times for residents who will need to cross this new freeway/corridor to travel.

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 2:53 PM  
**To:** I-11ADOTstudy  
**Subject:** Comment submittal to the Interstate 11 Tier 1 EIS Study Team  
**Attachments:** EIS Tier1 Comments 070716 from Robin Clark.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Attached please find my comments on the Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg. Thank you.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Date: July 7, 2106


From:



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

**RE: Scoping Comments on the Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg**

To Whom It May Concern:

 I live in the Barrio Sapo neighborhood on the west side of the Tucson Mountains. Our neighborhood shares borders with Saguaro National Park West, Tucson Mountain Park, the Bureau of Reclamation's Tucson Wildlife Mitigation Corridor and the CAP canal. The world-famous Arizona-Sonora Desert Museum is 3 miles from our neighborhood.

My neighbors and I are opposed to the Pima County Administrator's proposed I-11 highway bypass route through the Avra Valley on the west side of Tucson, because the environmental and community impacts could never be adequately mitigated. Instead, transportation planning efforts should focus on smarter and more sustainable solutions, such as expanding the capacity of existing transportation corridors, including increased use of rail for transporting freight. For example, a double-track rail line is a more economical and practical solution instead of relying on trucking for shipment of goods. Rail moves freight three times more efficiently than trucks, while reducing traffic congestion and greenhouse gasses.

We agree with the Pima County Board of Supervisor's 2007 Resolution No. 2007-343 opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." Additionally, the Board called for the expansion of "capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor." Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.

The Bureau of Reclamation manages the 4.25 square mile Tucson Mitigation Corridor (TMC) wildlife preserve on the east side of Sandario Road near Mile Wide Road. This wildlife preserve was established as mitigation for environmental impacts caused by the construction of the

nearby CAP canal. The Tohono O’Odham Nation’s Garcia Strip is on the west side of Sandario Road across from the TMC.

The proposed I-11 Avra Valley highway bypass route needs a 300-foot wide right of way here, where currently Sandario Road has an 80-foot wide right of way. This represents a *fatal flaw* in the proposed Avra Valley highway route, because the Bureau of Reclamation and the Arizona Game and Fish Department oppose any encroachment by a new highway adjacent to the TMC. Furthermore, the Tohono O’Odham Nation also opposes a highway bypass adjacent to their land and will not grant the necessary right of way that would be needed.

The environmental impact of the I-11 Bypass route extends far beyond the Tucson Mitigation Corridor. The Nature Conservancy Center for Science and Public Policy has concluded that the Avra Valley Bypass would negatively impact wildlife and habitat such that any mitigation would be unlikely to offset impacts. Also, the Coalition for Sonoran Desert Protection states that the impact of a massive linear feature such as a new highway, severing an important movement area for wildlife, cannot be adequately mitigated off-site. The Coalition argues that improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best minimize environmental impacts. The Coalition also questions the need for a new interstate between Nogales and Wickenburg at all.

Finally, I present you with a petition entitled “No Interstate 11 Highway Through the Avra Valley!”, signed by 909 people to date. We stand with the Sierra Club Rincon Chapter, Friends of Ironwood Forest, the Coalition for Sonoran Desert Protection, the U.S. Bureau of Reclamation, Arizona Game and Fish, the Nature Conservancy, Tohono O’Odham Nation and Saguaro National Park in opposing any I-11 highway bypass through the Avra Valley.

[REDACTED]

[REDACTED] “No Interstate 11 Highway Through the Avra Valley!” petition (909 signers so far)  
<http://petitions.moveon.org/sign/no-interstate-11-highway>



Date: July 7, 2016

## “No Interstate 11 Highway Through the Avra Valley” Petition

909 Signers and their comments are included in this petition.

<http://petitions.moveon.org/sign/no-interstate-11-highway>

Dear [REDACTED] Pima County Administrator, [REDACTED], District 3 Supervisor, [REDACTED]  
Arizona Dept. of Transportation, [REDACTED], Nevada Dept. of Transportation, and Pima County Bond  
Advisory Committee,

We are pleased to present you with this petition affirming this statement:

**"Join us in opposing any I-11 highway bypass route through the Avra Valley west of the Tucson Mountains, because the environmental, historic, archeological, and urban sprawl impacts could not be adequately mitigated.**

**Pima County Administrator [REDACTED] is actively pushing for an Interstate 11 highway bypass through the Avra Valley, despite a Pima County Board of Supervisors 2007 resolution opposing a highway bypass.**

**Additionally, as part of his I-11 strategy, [REDACTED] has requested \$90 million in Pima County Bond money for the construction of another new highway, called Interstate 510, that would link the proposed I-11 bypass with I-10 on Tucson's south side. We urge the Pima County Bond Committee, as well as the Board of Supervisors, to reject this request because many other worthwhile projects would be imperiled. If this \$90 million proposal is included in the November 2014 Pima County Bond election that goes before voters, we will campaign and vote against it."**

Attached is a list of individuals who have added their names to this petition, as well as additional comments written by the petition signers themselves.

Sincerely,  
[REDACTED]

---

[REDACTED]

---

Please respect and preserve our Sonoran Desert ecosystem.

[REDACTED] 5

---

[REDACTED]

---

There is NO PURPOSE and NO MONEY for a new corridor. Improve the I-8, I-10 and I-19 flow, or utilize the existing rail system.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

How will this affect run off waters during the monsoons? Will we have more flooding in our residential areas?

[REDACTED]

---

[REDACTED]

---

There is no reason for this interstate. Build a second level on I-10. All the land has already been bought and cists less

[REDACTED]

[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

Keep tucson beautiful! We do not need a highway bypass! What a waste of money. If we need any type of bypass/ highway it should be on the east side of town. But I guess all [REDACTED] rich cronies wouldn't want it in their backyard either!

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

Do not want an interstate in my backyard

[REDACTED]  
[REDACTED]

---

NO!

[REDACTED]  
[REDACTED]

---

A double decker road over I-10 is simply the only logical solution!!!

[REDACTED]  
[REDACTED]

---

No one is talking about how the light pollution from this will effect Kitt Peak, a valuable astronomic research facility.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

[REDACTED]

---

I live in the 85735 zip code and do not want the Interstate 11 Highway through Avra valley.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

No interstate through avra valley!!! Beautiful quiet desert. Don't ruin it!

[REDACTED]  
[REDACTED]

---

NO INTERSTATE THROUGH MY COMMUNITY.

[REDACTED]  
[REDACTED]

---

no new travel lanes- passenger rail instead. and shade it with solar- offset the power use of light rail and streecar throughout AZ.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

A freeway will not only destroy the way of life of the folks who chose to live away from Tucson proper, it will negatively impact Saguaro National Park West and the second most popular attraction in Arizona, Arizona-Sonora Desert Museum. And how is bypassing Tucson good for businesses located in town? This makes no sense and can not happen!

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

IF THIS PROPOSED INTERSTATE WERE TO BE BUILT IN [REDACTED] NEIGHBORHOOD, THIS WOULDN'T EVEN BE ON THE TABLE! BUILD IT IN YOUR OWN BACK YARD CHUCK!

[REDACTED]  
[REDACTED]

---

We do not want I11 going through here!

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

Huge NO!!! Can't you listen to the people?

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

Build the bypass through the well to do Catalina foothills nieborhood, see how much they like this idea.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

There is no reason for this to be built out here

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

I am not wanting this in any way! Another north & south bound freeway is not needed! This will infringe upon the Monument & the lifestyle many of us "out here" don't want--bringing traffic through our area. We live out here to be AWAY from the traffic & noise. DO NOT bring it to us!!!

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

---

We are opposed. We live in a beautifully unique area and it would be sad to see it destroyed for a highway.

[REDACTED]

---

[REDACTED]

---

No!

[REDACTED]

---

[REDACTED]

---

I reviewed the proposed corridor and couldn't figure out why that loop was needed. It appeared to me to cut up park land and invade wildlife corridors. It seemed to increase distance travelled for no good reason. If anything we need a better loop through the other side of Tucson.

[REDACTED]

---

This is a bad idea, please consider double decking I 10.

[REDACTED]

---

[REDACTED]

---

I love being able to raise my kids in a non busy area where they can play safely and we enjoy thr nature around us so peaceful and quite, no crazy traffic decent roads whats not to love! The valley is the best dont ruin it for the familys and the wildlife youve already destroyed it enough by putting dump sights out here!!! NO NO NO!!!!!!

[REDACTED]

---

[REDACTED]



[REDACTED]  
[REDACTED]

---

Keep the traffic on i-10.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

NO! Do any of you live out here? NO! Double decking is cheaper and has NO IMPACT to wildlife, peoples or homes.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

No to interstate 11!

[REDACTED]  
[REDACTED]

---

Don't let it happen. We all need some peace and quiet in our lives and that will end with this.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

No!

[REDACTED]  
[REDACTED]

---

We live in the rural area of pima county for a reason! We do not want a freeway in our area!

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

I am opposed to this because if I saw the plans right frim before my house is one of the 47 affected. If not being removed then we would be within a mile of the freeway. Crime rates would rise. We also would not get a view of the night sky lime we have always enjoyed. My family built this house in 1949 and I have no wish to see it destroyed for the sake of a freeway.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

---

There has been talk for decades of closing or making Picture Rocks Rd a toll road due to the environmental impact on the Saguaros . So now you want to run a major freeway by the National Park? You can't even fix pot holes in Tucson or finish I-10. The effects of the air, light and noise pollution would be devastating on many things. Saguaro National Park, Iron Wood National Forest, Tucson Mountain Park, Desert Museum, Red Hills Info Center, Kitts Peak, wildlife mitigation, animals, plants, historic and archaeological items such as the petroglyphs etc found on Golden Gate Rd. [REDACTED] and his cronies will make a lot of money at the expense of the only place on the planet like this.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

Build it elsewhere

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

I am opposed to this because of the negative impact it will have.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

It will destroy significant cultural and natural resources that deserve to be protected.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

Keep the interstate east of the Tucson Mtns. Leave Avra valley alone.

[REDACTED]  
[REDACTED]

---

[REDACTED]

---

This is ridiculous!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I don't see any major need for this highway. If Interstate 10 was always backed up with traffic, then I would see a reason for it. Keep the Tucson area the unique and beautiful area that it always has been.

[REDACTED]

---

Keep the peace of this beautiful place

[REDACTED]

---

[REDACTED]

---

I oppose any interstate highway through Avra Valley

[REDACTED]

---

This is a bad idea all around and I oppose the bypass.

[REDACTED]  
Oct 29, 2015

---

[REDACTED]  
Oct 28, 2015

---

Please do not ruin my backyard! Wildlife, air sounds of nature.

[REDACTED]  
Oct 28, 2015

---

I strongly oppose this idea!

[REDACTED]  
Oct 14, 2015

---

[REDACTED]  
Sep 2, 2015

---

[REDACTED]  
Sep 1, 2015

---

[REDACTED]  
Sep 1, 2015

---

Developers and their lawyers, and no one else, will benefit from this highway.

[REDACTED]  
Sep 1, 2015

---

[REDACTED]  
Sep 1, 2015

---

[REDACTED]  
Sep 1, 2015

---

[REDACTED]  
Sep 1, 2015

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Don't disturb the physical beauty of this area. It is also unnecessary and a waste of taxpayer money. There's no reason why it should not include the newly upgraded section of I-10 through Tucson.

[REDACTED]

---

A waste of taxpayer money. Use the newly upgraded section of I-10 through Tucson.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This by-pass doesn't make any sense: personal, economic, or environmental.

[REDACTED]

---

[REDACTED]

---

This is about attracting federal funds to Arizona, not about solving a transportation problem. It's a hair brained stupid idea that will damage the delicate National Park and wildlife areas for Mexican high pollution and noisy trucks. No one else on I-10 will take a detour that will cost them more money in gas and time. If we need such a corridor, it would be more cost effective to build a double-decker overhead bypass over I-10 like they have in San Antonio, Austin and other metropolitan areas. It's been shown to cost a fraction of what the I-11 bypass will cost. Lets preserve our National Parks and wildlife areas that are so important to metro Tucson.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

There has already been enough damage laid upon Avra Valley with the addition of a landfill. The environmental and residential destruction will be horrifying if this is built.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I've seen ecological destruction, I love the desert and don't want anymore of it to suffer!

[REDACTED]

---

[REDACTED]

---

[REDACTED]



---

solidarity!

[REDACTED]

---

This is a rural area, leave it that way!

[REDACTED]

---

[REDACTED]

---

Im born and raised in the area where this nonsense would be bouldering through and would hate to see my beautiful desert mowed over for an eyesore such as a highway that would bring more pollution a destruction to such a beautiful part of the world. Sauguro National Park and all the wildlife would be disturbed and greatly hurt do to this terrible idea. There are already highways to connect these bigger citys please dont destroy towns and beautiful scenery and plant life only native to this region of the world to safe yourselfs few minutes of transporting. Because in comparison for anyone for this highway it is just minutes as you may look at it as just a highway going threw small little towns. This been home to all of us for years that live here and wouldnt want to be anywhere eles. For what it will cost moneywise verses what it'll destory is just not worth it.

[REDACTED]

---

Horrible idea! Do not do it!!

[REDACTED]

---

We move out to the country to have peace and quiet. Don't take this away from us. We do not want a freeway going through here. There is nothing wrong with the roads we have for travel. We have horses. We don't want to have to ride next to a heavily traveled freeway. No no no.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Avra Valley is a place where families find peaceful living with good neighbors. Saguaro, Tucson Mountain & Ironwood parks are national treasures that are irreplaceable. Building the I-11 bypass will damage the ecology of the parks, the Indian nation and all of us that appreciate the peace and beauty we enjoy in Avra Valley. I urge the board to reconsider Avra Valley as a route for this project.

[REDACTED]

---

[REDACTED]

---

This I-11 bypass is not need and I vote against it!

[REDACTED]

---

No Interstate through Avra Valley where the Saguaro National Park West, Ironwood Forest National Monument, Tohono O'Odham Nation, the Cats (bob, mountain) and Tortoise play and live. Not to mention us humans. We like our wildlife and quiet area, that is why we moved out there in the first place. To get away from the city and interstate noise.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

i agree

[REDACTED]

---

[REDACTED]

---

This road should not be built. It's primary purpose is to make life easier for produce trucks out of Mexico.

[REDACTED]

---

once again, BIG BUSINESS is trying to take over.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Really? What happens to the MANY people, that, cannot evacuate when a toxic spill or other incident occurs? The county does not maintain most roads here. Come see what Picture rocks area looks like during a rain. A slightly above normal rain makes Pelto path an impassable running wash, and Ina road a raging river. Now add I-10 style accidents? Are you crazy?

[REDACTED]

---

[REDACTED]

---

Resident of likely impacted area: choice of location based on values of wildness, ruralness, and quiet!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This highway would be a totally unnecessary boondoogle for some and not needed by the rest of us. I-10 was just widened.

[REDACTED]

---

[REDACTED]

Dec 24, 2013

---

Put the enviornment first, and don't reward speculators.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

there is to little natural desert left-please do not ruin more.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I Oppose The 11

[REDACTED]

---

Save my bobcats..

[REDACTED]

---

We have a quiet little valley which is why we chose to live here. The national park is across the street from us and the whole aesthetic flavor of this beautiful area would be changed. A highway brings pollution (save our saguaros) noise, and commercial development we do not want nor deserve. The value of our house will go down. People who make these decisions do not have to have this monstrosity in their back yard and there has been no input from those who must endure it. There is a lack of democracy here.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

The construction of I-11 is a horrific plan that would devastate our environment, destroy our peace and quiet, decimate the value of our homes, create a hazardous area, pollute our ground water and air, and cut off natural animal migration routes. This plan is so appalling it is hard to believe that it was drafted by thinking human beings.

[REDACTED]

---

[REDACTED]

---

I was born and raised in Avra Valley...please, no! Tucson is becoming a concrete jungle as it is...please leave Marana and Avra Valley for us to enjoy our view!!

[REDACTED]

---

Putting an interstate through Avra Valley would ruin one of the most beautiful areas in Southern Arizona. I am very opposed to this idea!

[REDACTED]

---

I will vote against anyone who has approved this highway, study or implementation.

[REDACTED]

---

[REDACTED]

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Look north to Phoenix, is this what we want ? No !!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Bypass the Avra Valley with your highway

[REDACTED]

Oct 21, 2013



---

[REDACTED]

---

Please take an alternate route and keep Saguaro National Park and Tucson Mountain Park as they were intended - to preserve the desert plants and animals.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This would be a disaster for wildlife. The Tucson Mountains would become totally isolated. Saguaro National Park West and all it stands for would be in jeopardy. Is this the fate we want for our region?

[REDACTED]

---

[REDACTED]

---

Please protect our beautiful city, Mr. Huckelberry. Thank you.

[REDACTED]

---

[REDACTED]

---

Bad idea!

[REDACTED]

---

Stop the madness!! There are too few pristine desert areas left already.

[REDACTED]

---

A freeway through the Avra Valley is a bad idea, for many reasons. Please consider other, more sensible alternatives.

[REDACTED]

---

[REDACTED]

---

I had no idea this was happening before now. Surely other areas should be explored for a major highway bypass like this.

[REDACTED]

---

not in my backyard! Put up a double rise over the 10.

[REDACTED]

---

[REDACTED]

---

Protection of Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument and the whole natural environment in the Avra Valley west of the Tucson Mountains is paramount. No mitigation in this area is possible .

[REDACTED]

---

no Interstate 11 through Avra Valley

[REDACTED]

---

I grew up in Silver Bell and attended all 12 grades in Marana. Please do not degrade our home territory.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I am concerned about my neighborhood, including the wildlife I so thoroughly enjoy in the washes and trails that would be affected by this roadway. Please no highway in my backyard!

[REDACTED]

---

I strongly oppose the I-11 Highway through our beautiful valley. The animals you would be destroying not to mention vegetation is unacceptable. You can double deck I-10, there are feasible studies to show that it is an acceptable alternative!!!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

At a public meeting 5-6 years ago 3 by-passes were suggested and the consulting firm studying the feasibility of a by-pass stated that it would alleviate 1-15% of the traffic through Tucson. This is a bad idea that hopefully will not become reality.

[REDACTED]

---

[REDACTED]

---

Roads are ruining our untamed natural wonders. Please have respect for this planet.

[REDACTED]

---

[REDACTED]

---

I live in Picture Rocks and I do not want an Interstate anywhere near my back yard that's why I moved out here !!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Leave the valley the way it is. We all live here because we like the desert and being away from major roadways.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I do not agree with it because I don't want to sell my house because I just bought it a year ago and its mine and my husbands first house and we're raising our little boy in the same neighborhood I grew up in and believe it or not you're ruining little kids playground because my kid plays in the desert

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Fix the Roads we Have. No need to build new ones.

[REDACTED]

---

[REDACTED]

---

Please do not do this!!!!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

WE live here. We do not want this highway going through our community. We live away from the city for a reason, to avoid traffic like this.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Please don't allow a new highway on the proposed route.

[REDACTED]

---

There are many things Pima County needs before this. I question the real reason behind this proposal.

[REDACTED]

Oct 10, 2013

---

Don't want this quiet valley to have the noise and traffic. I t will take away from Kitt Peak. It will not benefit Tucson or the folks out here.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

There are more important things to spend infra-structure money on.

[REDACTED]

---

[REDACTED]

---

I live in Avra Valley and moved here to avoid congestion and the city. An interstate through this beautiful valley would destroy it and cause untold damage to the area. Lets preserve our beautiful Sonoran Desert instead of paving it.

[REDACTED]

---

I have a multiple chemical sensitivity disability...this highway will harm my health. Please do not make this project a reality.

[REDACTED]

---

[REDACTED]

Oct 10, 2013

---

This highway will be disruptive and have no benefits to local residents. I do not support it.

[REDACTED]

---

I oppose!

[REDACTED]

---

[REDACTED]

---

I absolutely oppose the I-11 highway route through Avra Valley west of the Tucson Mountains. There is no reason to ruin that area when I-10 could be expanded to handle that load and already is environmentally adapted to handle it. Tucson business would also lose money if the highway would bypass Tucson as more motorist would bypass Tucson altogether. No I-11 West of the Tucson Mountains!

[REDACTED]



---

Please don't destroy the natural beauty of the land. So much is gone now!

[REDACTED]

---

It is all about politicians lining their pockets with our tax dollars.

[REDACTED]

---

[REDACTED]

---

[REDACTED]  
Oct 10, 2013

---

enough already!!!! This is for LAS VEGAS!????!! to destroy the desert for greedy BS? Please! NOOOO!!!!

[REDACTED]

---

[REDACTED]

---

[REDACTED]  
Oct 9, 2013

---

Sure, this looks like a great opportunity for growth in Tucson, but at what cost? You have a duty to make a very big effort to engage the community in this decision.

[REDACTED]  
Oct 9, 2013

---

BAD IDEA

[REDACTED]  
Oct 9, 2013



---

Please leave our Wild Lands intact. Don't build here.



---

No I 11 in Avra Valley. There is the Saguaro National Park. Ironwood National Forest. Desert Museum. Tucson mountain Park. Wild life mitigation corridors and it is a low light area for Kitts Peak. Just to name a few reasons why NOT to put I 11 through. Avra Valley

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Look at the plan. No way is it sensible, except for developers who may have already invested in the area.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I want to help top protect the native habitats in Arizona

[REDACTED]

---

[REDACTED]

---

Highway boondoggles are so 20th century

[REDACTED]

---

[REDACTED]

[REDACTED]

---

[REDACTED]  
[REDACTED]

---

This is an pristine, beautiful area of beauty that cannot be replicated. It is a favorite area of our travels. Please DO NOT allow a highway bypass to ruin this gift of nature.

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

[REDACTED]  
[REDACTED]

---

Double-deck what already goes through Tucson...no need to destroy a very beautiful desert.

[REDACTED]  
[REDACTED]

---

Let nature be

[REDACTED]  
[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

If the point of this highway is to funnel interstate business into Tucson, it needs to go into Tucson, not way out west of the mountains. It should follow the I-10 footprint. Putting it out here will encourage business to bypass Tucson.

[REDACTED]

---

Time out. Let's declare a moratorium on such projects! We need to save our wild places for future generations.

[REDACTED]

---

Please do not put this Freeway into this beautiful untouched desert. It will be polluted by noise and exhaust and people! Keep this place for our future children to visit and be taken by its beauty

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Heidi jackson

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I think that there could be a better place to put I-11. I feel like the cap has already took one of the most beautiful looks at the desert and put there C.A.P. water reservoir. Why not bring it in some where around pinal road and over?

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

No unnecessary highways! Use the money for education!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Having visited this beautiful desert valley area before, I fully agree with and support the statement herein.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

NO!!! I-11

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I recognize that there are economic benefits to the region; but there are equally serious negative environmental benefits, not to mention lack of water to support the future growth that this will cause. This needs way more thought and public discussion before it moves forward.

[REDACTED]

---

[REDACTED]



[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

No to more major destruction of our surrounding natural environment!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Please don't destroy our Sonoran Desert and it's environment!!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

No bond money for this boondoggle.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This bypass is unnecessary and would cause incalculable ecological and cultural damage.

[REDACTED]

---

No!!!

[REDACTED]

---

we said no the first time. don't you people know when we said no we men't no

[REDACTED]

---

No bypass thru Avra Valley!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Stick to existing transportation corridors!

[REDACTED]

---

[REDACTED]

---

I think that somebody is about to make a lot of money on this. The people of the valley have been long denied a commute road to the city and suddenly an interstate pops up. Interesting that an interstate and a powerline initiative keep getting pushed by people who stand to gain.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Not a good idea. Too much asphalt. Too many roads. Too many vehicles. Not enough public transportation.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

No to Interstate 11

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

[REDACTED]

---

[REDACTED]

---

I can't imagine a better way to ruin the experience of Tucson Mtn. Park and Saguaro National Park West.

[REDACTED]

---

[REDACTED]

---

Bypasses kill towns. Highways kill ecosystems by dividing populations

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I strongly oppose any I-11 highway bypass through this beautiful Avra Valley - I believe Mr. Huckleberry needs to seriously think of an alternative before he's allowed to spoil this beautiful part of Tucson once and for all. There ARE alternatives, and they've been pointed out, so take a REALLY good look at them before allowing this rape of the Avra Valley.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Just say no!

[REDACTED]

---

[REDACTED]

---

I agree, find another way that is not going to cost people their homes and make such a negative impact on the wildlife.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I live in Avra Valley and of course I want to sign. Why do they have to mess this all up?

[REDACTED]

---

No way, I'm sick if big expensive County road schemes. We need a more liveable city: invest in walking, biking, transit!!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

we don't need more roads. the \$ can be spent on par more productive things.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Nobody needs this. But if you're going to spend our money we can use safe bike lanes and sidewalks, underground electrical services, improved intersections, and many other useful civic facilities.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

No more roads, please. The environmental impact will be devastating to our beautiful old Tucson desert. More wildlife will be pushed out of their native habitat and further endangerment of our rare fauna and flora. Please do not bring Interstate 11 to our state. Thank you for your time and endless efforts to create this wonderful city we have all grown to love.

[REDACTED]

---

There is no need for another highway, and evidence shows that it will not alleviate any traffic despite common belief.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]



---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I think the idea is horrible!! To displace people through eminent domain is even more horrendous!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

---

This is a terrible idea. Promoting bad sprawl while uselessly spending billions of dollars doesn't make any sense whatsoever. What little respect I had for Chuck Huckleberry is certainly gone.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I frequently visit this area for birding and other nature watching and related low impact outdoor activities. It is relatively unspoiled. Honor the 2007 resolution.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I would prefer a high speed rail between Tucson and Phoenix.

[REDACTED]

---

The highway is bad enough, but it would spawn abundant infrastructure that would further destroy the functional peacefulness and productivity of a desert wonderland.

[REDACTED]

---

No freeway through our valley! Email your friends and neighbors and let them know the scoop.

[REDACTED]

---

Should of been told about this!!! What houses are involved? To tear up a national park too.

[REDACTED]

---

NO!! No, no, no, no!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I moved out here to get away from highways and such to enjoy the wildlife and tranquility. This is a new neighborhood !

[REDACTED]

---

I appose the proposed I-11 bypass through Avra Valley.

[REDACTED]

---

I live in avra valley

[REDACTED]

---

[REDACTED]

---

Use I10 still being built plenty of room

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Tucson native that does not want to see destruction of pristine desert lands.

[REDACTED]

---

[REDACTED]

---

NO to highway bypass through Avra Valley

[REDACTED]

---

Please do not bring development along with the inevitable air, noise and light pollution to our peaceful valley especially when there is an economically feasible alternative right over I10. This is not progress; this is destruction of an increasingly threatened space - the Arizona/Sonora desert.

[REDACTED]

---

I Do Not Want the freeway

[REDACTED]

---

I believe this not only will destroy all we've been protecting around this area, but it will also provide a fast highway for illegal activity such as drug & human trafficking ! Will kill animals known in this area & destroy many families lives & our all residents in Tucson Metro area in danger with illegal activity getting increased. Not to mention the money involved !!

[REDACTED]

---

The reason we live in Picture Rocks is to get away from the city ,so don't bring the city to us. There is also an extremely high amount of Natural Wildlife that you will be harming as well, including thier habitat!

[REDACTED]

---

[REDACTED]

---

Please help us save our peaceful valley!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Chuck Huckelberry is a "huckelberry." What does he THINK he's doing!!??

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

As a former resident of Avra Valley and currently looking to relocate in the Tucson Mountains of Tucson, I strongly oppose this highway. Please don't turn Tucson into another Phoenix.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

---

[REDACTED]

---

No good can possibly come from this.

[REDACTED]

---

If you build it, we will move immediately.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

no interstate highway

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]




---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

There is not enough traffic restriction on I-10 to warrant a by-pass. Our historic and environmental needs far outweigh any need for additional concrete.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Let us not continue to pave over our desert in the name of progress. We've damaged the land too much as it is. This is all that there is. We cannot make more land nor replicate our delicate environment.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

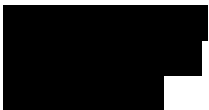
[REDACTED]

[REDACTED]



---

Don't tread on us!



---

New bypass freeways rarely stay only bypasses - developers so often use them for suburban sprawl, and the valley is too narrow. It's really serene as it is and this "I-11 extension" as described would ultimately ruin the serenity of the Tucson mountains and beyond.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

NO NO NO I-11 BYPASS THANK YOU

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This is a terrible idea. Get a grip on reality: no more interstate highways, period.

[REDACTED]

---

[REDACTED]

---

I split my time between WA. and Tucson and first moved to AZ. in 1975. I've seen too many irreplaceable parts of the Sonoran desert already destroyed by development. If I-10 needs to be expanded that's one thing, but don't touch one of the last special parts of the desert left close to Tucson.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]


---

Huge environmental damage to the region!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Cathy Youngblood

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This highway would negatively affect a beautiful area of Arizona and increase growth in that area ruining it even more. Pima County does not have the money to adequately take care of it's current size, much less add this to its responsibility.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Let's focus on increased rail shipments and a high-speed rail line between Tucson and Phoenix instead of continuing to look for more ways to put more concrete and blacktop down in the desert and in our cities.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]



---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Much needs to be done before any possible decision for an alternative route can even be decided. What are the other Alternatives? Environmental and community impacts? etc.

[REDACTED]

---

This is a shameless pro-growth, pro-development proposal with complete disregard for the desert and its inhabitants -- human and otherwise. The Avra valley, notably the western slopes of the Tucson Mountain range is already seeing deterioration due to the interference of the CAP -- despite the mitigation corridor. This is no way to treat the Sonoran Desert -- a unique national treasure.

[REDACTED]

---

This would destroy a beautiful part of our Sonoran Desert

[REDACTED]

---

Urban sprawl is killing us and the environment that sustains our livelihoods and the economy. This is a desert, not Chicago.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Don't kill the beautiful plants

[REDACTED]

---

Please don't build a by-pass route through Avra Valley. Enough is enough, the desert provides a great sense of solitude and we don't need more urban sprawl. We're already in a water crisis here in Arizona and we need to slow down development and protect the desert, we don't want or need more development at all!!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This highway is not needed and will trespass through some very sensitive, beautiful landscape. Our goal should be to reduce travel on highways, not increase it. This effort will jeopardize the whole bond election. Preserve southern Arizona.

[REDACTED]

---

I agree most heartily with Robin. She words her opposition quite well. I am against the proposal to construct an I-11 bypass.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Thank you for reviewing carefully any plans to disturb the desert for yet one more highway. We must responsibly protect the desert lands, its history, culture, sustainability - Please consider alternative, creative ways to meet all the needs without building one more highway. Many thanks, [REDACTED]

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Stop urban sprawl and noise pollution from creeping into our beautiful valley. The beauty and preservation of AZ Sonora Desert Museum and Sahuaro National Park West would be also be destroyed. Go elsewhere with this plan.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Yet another reason to oppose the I-11 Bypass route proposal is that rapidly developing autonomous vehicle technology will reduce headspace (safe distance between vehicles), thus dramatically reducing highway congestion. The I-11 bypass proposal is based on outmoded thinking and is entirely unnecessary.

[REDACTED]

---

[REDACTED]

---

Please do not destroy the Avra Valley, Saguaro Park West and the Ironwood Forest National Monument. Consider using existing I-10. Do not destroy more of our Sonoran Desert.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Cancerous "bypass sprawl" is not environmentally responsible. We need to figure out how to reduce local traffic on I-10.

[REDACTED]

---

There are sufficient freeways to serve the needs!



---

Putting in this interstate would destroy the natural beauty surrounding the Saguaro National Forest.



---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

The Avra valley should not be fragmented.

[REDACTED]

---

This is so absurd! We are widening I10 to cover this traffic. NO absolutely NOT!!

[REDACTED]

---

[REDACTED]

---

A terrible idea that should have died with the I-10 bypass.

[REDACTED]

---

[REDACTED]

---

This highway is totally unnecessary. Let's NOT build it and save the environment and the night sky instead.

[REDACTED]

---

[REDACTED]

---

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Build a new road when they can't even maintain the ones we've got? Crazy!!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

As a child of the Southwest, I beg of you not to subject our beloved Avra Valley to this paving of paradise...

[REDACTED]



---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

We neither want nor need another interstate. Allowing it's construction will create another Tucson on the west side of the Tucson Mountains.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

---

[REDACTED]

---

This project would DESTROY Avra Valley, increase pollution, traffic, noise and make Tucson into an urban nightmare. We need a modern, efficient, less polluting transportation system. not more roads for more cars. Some people must stand to make to make fortunes off this, as that's the only reason for its proposal.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

There has to be a better way that's environmentally friendly!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This freeway will not help anyone! Traffic on i10 is never heavy enough to support this project. We need high speed rail not more freeways!

[REDACTED]

---

[REDACTED]

---

Let's use I-10 & I-19. It seems the costly 'I-11' scheme is quietly aimed at more urban sprawl in Pima County.

[REDACTED]

---

[REDACTED]

---

This is a time when we should be concerned about global warming and its impact. A full 6% of the world's energy goes toward cement production. Highway creation is very high in CO2 produced with energy used for cement and steel. Additionally, desert spawl, which the Avra Valley option would foster increases CO2 production.

[REDACTED]

---

We dont want a bypass through our beautiful desert, face it, you guuys ruin everything youtouch! Leave nature alone!

[REDACTED]

---

I love every inch of Arizona and don't want to see one more square mile of it despoiled by chewing up any more of it's wild beauty with a bypass

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

More sprawl and more roadways are not necessary for Tucson's infrastructure. Let's care for our environmental and cultural heritage, and make a commitment to more sustainable development.

[REDACTED]

---

We don't need another highway destroying wilderness.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Am 1 mi W of Sandario, 1, mi N of Ajo Way--am opposed to any new construction labeled "Hwy 510" through the Sandario/Saguaro Natl Park area--the time for Big Highways & clearing new land is clearly over--double deck the existing freeway in Tucson for ecological and financial reasons--the only route that makes sense.

[REDACTED]

---

It would be a shame to tear up Avra Valley, where most residents treasure the quiet, close-to-nature lifestyle that it now provides. Wildlife has already been disrupted by the CAP. despite all attempts at mitigation. A freeway would be immeasurably worse.

[REDACTED]

---

[REDACTED]

Aug 19, 2013

---

Tucson is full of horrible potholes. Let's fix those!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

There surely is an alternate to a route through Avra Valley--one which will have less negative environmental impact.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Please do not proceed with this project!

[REDACTED]

---

How can we help come up with an ecologically and economically sound alternative???

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

The nation's huge freeway system is not sustainable - expanding it is folly.

[REDACTED]

---

Time and time again, local residents have worked together with county, state, and federal entities to set aside lands from development to promote the conservation and preservation of our natural and cultural resources. This plan flies in the face of the hard work that has been done to date.

[REDACTED]

---

[REDACTED]

---

Saguaro National Park and the Arizona-Sonora Desert Museum lie in the pristine desert habitat on the west side of the Tucson Mountains. I 11 would create a small commercial city through the valley destroying the views and appeal to thousands of money bearing visitors to the Tucson area.

[REDACTED]

---

Highway is important, however, please put it another place that doesn't affect so many people and animals.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

IMHO, it would be better and more efficient to connect I-11 at Casa Grande as originally proposed, or to connect to I-8 south of the I-10 connection west of Phoenix.

[REDACTED]

---

we do not want another Phoenix area here. We need to protect our wildlife and history that made Tucson what it is today.. thank you for your support.

[REDACTED]



---

[REDACTED]

---

[REDACTED]

---

I have been a dunno rat since 1961 I have not voted for communism since. [REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

don't we have enuff interstates?

[REDACTED]

---

[REDACTED]

---

There has to be an alternate solution to whatever the so called need is for this highway!

[REDACTED]

---

No Interstate 11 Highway Through the Avra Valley!

[REDACTED]

---

[REDACTED]

---

The I-11 bypass overlooks the value of our natural resources. Tourists come to Tucson to enjoy our weather but also to see the beautiful Sonoran Desert. The Tucson Mountains are the easiest way to explore the desert. Having a freeway run through the Avra Valley would destroy this valuable resource.

[REDACTED]

---

As a Pima County taxpayer, I strongly oppose the plan. This is a beautiful area that would be destroyed by the bypass. It would come within a mile of my property, and the resulting of noise and pollution would be unacceptable.

[REDACTED]

---

Why would we want to blade more pristine, sonoran desert land to put in another roadway close to saguaros Nat'l park, west and the ancient picture rock and signal hill? NOOOOO.

[REDACTED]

---

[REDACTED]

---

The negative impacts of this unnecessary route far outweigh any slight advantages. Let's not destroy another beautiful part of Arizona!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

no I-11 through Avra Valley

[REDACTED]

---

[REDACTED]

---

Please, for the love of God, do NOT let this interstate be built. it will ruin one of the most beautiful pieces of land in America.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

We do NOT need another freeway. It's time to protect what's left of the natural treasures of this state and keep the existing environment safe.

[REDACTED]

---

[REDACTED]

---

As as former Tucson resident, I often enjoyed the wild, scenic and peaceful Avra Valley, and nearby sites like Ironwood Monument, Saguaro Park, and Tucson Mountain Park.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This highway would be detrimental to the ecology of Avra Valley. It would be detrimental to Tucson's economy, which depends on interstate traffic.

[REDACTED]

---

[REDACTED]

---

Stoip the I-11 Bypass Route!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

There are far better alternatives for this route. It is a waste of tax payer monies and will bring pollution, noise and disrupt the wildlife and beauty of a fragile desert area. Enough! No I-11 through Avra Valley.

[REDACTED]

---

Don't destroy the valley!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This is the wrong time to spend money on a wasteful project, let alone the environmental damage this will cause for generations.

[REDACTED]

---

[REDACTED]

---

We concur, AMEN!

[REDACTED]

---

Keep Avra Valley clean and free from pollution for human and other desert dwellers!

[REDACTED]

---

The environmental impact plus the dirt and noise of construction of such a hwy over many years would drive away many of the winter visitors (such as myself) and their \$\$\$\$

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This area is of national value because of the national park and national monument.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This has been labeled a "Freight highway" to most of us residents in the Avra Valley area. As there is already a freight depot at the Nogales border, AND a huge rail yard has been approved at Red Rock, AZ, 20-30 miles W of Tucson, why not just add additional rail lines for this "Freight" to be railed too and make a truck hub near or around the Red Rock rail yard facility, thus eliminating all this huge ADOT expenditures, (so much cheaper to ship by rail anyway), and Red Rock does not have anything near the population of Tucson, let alone Avra Valley, is practically out in the middle of nowhere!! Has this alternative ever been looked into or proposed?

[REDACTED]

---

THIS SHOULD NOT EVEN BE AN OPTION!

[REDACTED]

---

That proposed new fwy would give me freeway front property. No Thank you!

[REDACTED]

[REDACTED]

---

It is a crime against the environment and against our ancestors to destroy beautiful wildlife habitat and archeological resources.

[REDACTED]

---

America's past was defined by rapacious exploitation. Her future will be defined by balanced conservation.

[REDACTED]

[REDACTED]



---

Save the land, animals, and beauty of Avra Valley and double-deck the current I 10. Lets be smart about spending tax payers money.

[REDACTED]

---

get permission from the TohonoOodham nation to put a tool road as the by pass on their land and let them have the income from the road to use for health care of their members

[REDACTED]

---

Keep our dark skies dark! Kitt Peak will be affected by highway lights, as well as the residents in Avra Valley. Don't take away my Milky Way!

[REDACTED]

---

[REDACTED]

---

Those 18 wheelers on the hi way will smog up this valley. I live near Sandario and Mile Wide so they will proolly take my house too and I love my acre !

[REDACTED]

---

Please don't do this. Let's commit to ecologically sensitive development projects for the folks who live and work here, and less enormous, expensive road-building!

[REDACTED]

---

[REDACTED]

---

looks more like a faster route to Las Vegas then Canada!

[REDACTED]

---

Outrageous destruction of natural habitat for so much wildlife and the unique beauty of the Sonoran Desert.

[REDACTED]

---

We voted this down in the last election. It will cut off wildlife movements between the Tucson Mts and what remains the only untouched portion of the AZ Sonoran Desert close to Tucson. It will hurt the tourist trade as the Saguaro Park West is the #1 favorited destination. This bypass will enable drug runners an easy path for moving Mexican drugs north, west and east into the US. It will pollute the environment with the fumes from diesel engine semi-trucks hauling produce from Mexico. It is also a violation of the Environmental Justice ruling to protect low-income homes from industrial pollution. We already have sand and gravel pits and Portland Cement on Avra Valley Road. We have two dumps, one at Tangerine and one large one on Avra Valley road. We have the limestone open pit mine that has devoured one of the Twin Peaks and is building up high mounds of waste rock. We have the Marana Airport, and a Solar Panel Farm. We have heavy Waste Management trucks tearing up our roads and polluting the air. We have the CAP Canal and Silverbell Mine. We also have Native American historical sites and religious sites. We have crop dusting planes to spray fields and defoliant on the cotton fields. I-11 will cost billions of dollars more than double decking 9 miles of I-10, and our taxes are high enough. Follow the money and see who will profit the most from this highway while the taxpayers foot the bill. Please vote against this plan. Thank you.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

No Interstate 11 Highway through the Avra Valley!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

The idea of adding a new Interstate at this time in our economy and planet and society is downright mischievous and quite insane. Whatever could you people be thinking of? With all the road improvements and other things in the area that we need, why is this idea being seriously considered, again?? I went to a meeting some years back about it and hoped that sense would prevail. Shall I still hope?

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

This proposal is ludicrous.

[REDACTED]

---

it a tragic mistake to impose the irreversible damaging impact of a full scale highway running through and ruining a culturally and ecologically sensitive area.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Keep the desert museum area pristine, please. No new highway in this important spot.

[REDACTED]

---

I visit the area where the highway is proposed to be built and I can say that not only would it bring devastation to the land and animals in the area but the light pollution would be detrimental to Kitt Peak. In addition to the reasons I have already mentioned, the noise pollution to the area would greatly impact the people who live in the area. I don't see why a bypass is even needed as you already have a great system in place with the frontages next to the highways in town.

[REDACTED]

---

[REDACTED]

---

An interstate highway through the Avra Valley of Arizona is a bad idea whose time came and went thirty years ago. It will not bring prosperity to Tucson, but it will bring destruction to wildlife habitat and human neighborhoods. Chuck this Huckleberry Highway!

[REDACTED]

---

we cannot afford these highways financially and/or environmentally !

[REDACTED]

---

[REDACTED]

---

As a small business owner of a vacation rental overlooking the Avra Valley, I can attest to the importance of maintaining the peace and solitude of this area as an economic matter. We do not need the urban sprawl that would result from an intrusive highway through this area with its important historic, environmental and archeological assets.

[REDACTED]

---

CHUCK THE HUCKELBERRY HIGHWAY !! Save the Avra Valley. Double-decking six miles of I-10 is cheaper and according to ADOT, will do everything they want done.

[REDACTED]

---

You need to stop this project for many reasons already mentioned but also because it will bring light and air pollution into an area that will effect Kitt Peak and its important research.

[REDACTED]

---

It would be a travesty to ruin the beauty of the unique saguaro forest in the Avra Valley with the noise, air and visual pollution of the proposed bypass.

[REDACTED]

---

This is a ridiculous proposal. The damage and losses to a beautiful historic, area, the environment, wildlife habitat, and the people who reside in the area is not even remotely justified by the minimal benefit this project will provide. The wishes of the people should always take precedent over business interests. The people ARE the economy, and the people themselves will decide what is in their best economic interests.

[REDACTED]

---

[REDACTED]

---

I strongly oppose the I-11 bypass through the Avra Valley. It will have a terrible impact on the environment and wildlife in one of the most beautiful parts of the greater Tucson. As the owner of a piece of property that is approximately a mile from the proposed road, my quality of life would be adversely affected, exposing me to noise, pollution, and a visual eyesore. I strongly urge you to oppose this highway. [REDACTED]

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

I will not vote for is bond!

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

Sure hope this does NOT happen...the land on the west side of the mountains should remain raw and pristine forever.

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

[REDACTED]

---

My business and home are in Avra Valley. We have lived here 13 years. We built here specifically to be in the most untouched patr of the Sonoran Desert but still be able to enjoy Tucson city life. really, just double deck 10. Do you need to destroy all of Arizona?

[REDACTED]

---

[REDACTED]

---

[REDACTED]



**From:** [REDACTED]  
**Sent:** Saturday, July 02, 2016 3:14 PM  
**To:** I-11ADOTstudy  
**Subject:** Comments on I-11 corridor

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I am highly opposed to the construction of a new interstate corridor through Avra Valley for the following reasons:

1. An interstate would further disrupt wildlife corridors
2. The proposed location is within a significant floodplain and it is not wise to promote additional development within the floodplain
3. It would require the construction of significant infrastructure to support the traffic load
4. Making the existing I-10 corridor a double deck interstate accomplishes the same goals with far less impact, and would further support the business that already exist along I-10.
5. It's a waste of money. Improving I-10 is cheaper.
6. It would damage the viewshed of Saguaro National Park

And all this coming from someone who will probably be adversely impacted by increased traffic along the I-10 corridor. I'd rather be impacted myself than to wreck a whole new area with a new interstate.

Regards,

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, July 01, 2016 2:23 PM  
**To:** I-11ADOTstudy  
**Cc:** Marcos Robles  
**Subject:** Comments on Interstate 11 Tier 1 Environmental Impact Statement  
**Attachments:** 2016 07 01 TNC Scoping Comments on I-11.pdf; I-11 TNC Comments Level 1 Letter & Appendices 9-18-2013.pdf; I-11 TNC Comments Level 2 Letter & Appendices 12-6-2013.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir/Madam: Please accept our comments on the Interstate 11 Tier 1 Environmental Impact Statement.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [www.azconservation.org](http://www.azconservation.org)

July 1, 2016

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

To Whom it May Concern:

On behalf of The Nature Conservancy in Arizona, thank you for the opportunity to provide scoping comments on the *Interstate 11 Tier 1 Environmental Impact Statement (EIS)*. We commend ADOT for your efforts to seek stakeholder input at the start of this important process and focus our comments on ways to effectively move forward with infrastructure planning while avoiding, minimizing and mitigating for impacts to natural resources.

We would first like to call your attention to the recommendations The Nature Conservancy and other stakeholders provided on the study that preceded the current EIS process, *the Interstate 11 Corridor-Wide Alignment Alternatives*, completed in 2014 using ADOT's Planning for Environmental Linkages (PEL) framework. Although that study was conducted before a formal NEPA process, it contained extensive scientific analyses of potential environmental impacts of proposed interstate routes, many of which are within the boundaries of the current study, and therefore are relevant for this study.

We suggest similar analyses be conducted for this EIS study: 1) identify routes to avoid because they impact natural resources that are irreplaceable and for which compensatory mitigation is not feasible; 2) identify routes where there are opportunities to enhance motorist safety and wildlife passage by adding wildlife crossings; 3) identify routes that have minimal impact; and 4) study minimization and mitigation measures to compensate for lost resources. In our PEL analyses, we found >75% of the proposed routes fell into categories 2-4 above, while only a small percentage fell into category #1. We respectfully resubmit our comments for that study (attachments below) so that they can be fully considered for this EIS process.

Second, the preferred alternative of the EIS should avoid areas that were acquired or identified for conservation and/or mitigation purposes. In southeastern Arizona, these include lands in Pima County, including Avra Valley, that were acquired under the Sonoran Desert Conservation Plan and fulfill requirements under the Endangered Species Act section 10 permit recently issued by the Fish and Wildlife Service to the County. West of Casa

Grande, Rainbow Valley was recently identified as one of the highest scoring candidate sites for mitigation of lost natural resources for solar development on solar energy zones designated by the Bureau of Land Management in their “Regional Mitigation Strategy for the Arizona Solar Energy Zone Final Report”

([http://www.blm.gov/az/st/en/prog/energy/solar/arizona\\_regional\\_mitigation.html](http://www.blm.gov/az/st/en/prog/energy/solar/arizona_regional_mitigation.html)).

Consistent with our level II PEL comments (attached), we recommend that any interstate alignment west of Wickenburg avoid the Hassayampa River corridor (now part of the Vulture Mountains Regional Park) which is a unique aquatic and riparian resource in the Sonoran Desert. We would be glad to share data or direct you to specific sources of information on this area.

Finally, we recommend that ADOT work with regulatory and land management agencies to develop a programmatic, regional mitigation plan that would evaluate impacts and develop a comprehensive regional strategy to mitigate for losses associated with the interstate.

The Fixing America’s Surface Transportation Act, or FAST Act, which formally designated I-11 as a US Interstate, directs that agencies “shall give substantial weight” to these regional mitigation plans. Where developed in coordination with agencies in other states, these plans have substantially sped up the approval processes. Completion of such plans would enable ADOT to reach agreement in advance with a wide variety of stakeholders on areas suitable for maximizing multiple benefits and minimizing impacts to the natural resource values that contribute to Arizona’s quality of life and economic health.

If you have questions regarding our recommendations or the background information, please do not hesitate to contact me. [REDACTED]

Sincerely,

[REDACTED]

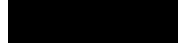
[REDACTED]

Attachments:

I-11 TNC Comments Level 1 Letter & Appendices 9-18-2013.pdf

I-11 TNC Comments Level 2 Letter & Appendices 12-6-2013.pdf

September 18, 2013

  
Director of Planning and Programming  
Arizona Department of Transportation  
206 S. 17<sup>th</sup> Avenue, Mail Drop: 310B  
Phoenix, AZ 85007

Dear 

On behalf of The Nature Conservancy in Arizona, thank you for the opportunity to provide comments on the proposed *Interstate 11 Corridor-Wide Alignment Alternatives*. Our analysis and comments are focused on assisting with the **Level 1 Planning and Environment Linkage review (PEL)**. Use of the PEL process represents a significant advancement towards more integrated infrastructure planning, which should yield better planning tools and improvement in project delivery times while avoiding and minimizing impacts to natural resources.

Detailed comments and our evaluation for each alignment as well as supporting materials, such as analytical methods, criteria, and datasets are provided in **Appendices A-D** (attached). Below is a brief summary of our findings.

We systematically evaluated 61 proposed alignment segments for the Arizona portion of I-11. Of those, we concluded that 39% have either limited impacts to wildlife and water resources or impacts that could be offset through mitigation measures. For 49% of the segments we concluded that there is an opportunity to improve both passage of wildlife around existing roadways and motorist safety using practices already adopted by the Arizona Department of Transportation.

Only 12% of the segments were identified as having significant impacts to wildlife or water resources important to wildlife that would not be offset by mitigation options. In these cases, proposed alignments would result in significant habitat loss or fragmentation and have adverse impacts to wildlife in areas acquired, designated, and managed for conservation purposes (ex. National Wildlife Refuges), would adversely impact wildlife and habitat not well represented elsewhere in the state or needed to ensure that wildlife populations are sustainable into the future, or have adverse impacts to Threatened and Endangered or special status species.

The areas of most concern from a conservation standpoint and for which we are recommending they not be carried forth to the Level II Review, include alignments through Organ Pipe Cactus National Monument and the Buenos Aires National Wildlife Refuge in southern Arizona, and those proposed to enter and traverse the Williamson and Big Chino Valleys and Burro Creek area in north, central Arizona. For some alignments, such as those that would cross the Upper San Pedro River Valley, the potential to offset impacts would depend upon more specific details of the alignment including access points.

If you have questions regarding our recommendations or the background information, please do not hesitate to contact me. I can be reached [REDACTED]  
[REDACTED]

Sincerely,

[REDACTED]

[REDACTED]

Cc:

Governor [REDACTED]

Congressman [REDACTED]

[REDACTED] Director, Arizona Game & Fish Department

[REDACTED] Executive Director Interstate 11 Coalition



## Appendix A. Methods and Criteria

We designed our analysis to facilitate one of the primary purposes of the Level 1 PEL review, to distinguish infrastructure alignment alternatives that may be incompatible with the long-term sustainability of important natural resources from those alternatives that may have limited impacts or impacts that otherwise may be avoided, minimized, or offset. At this level of analysis two primary factors were used to distinguish the scope and magnitude of potential impacts. The first is the change in baseline infrastructure conditions for the proposed alignment area, which is used to determine the scope of change and magnitude of impacts such as habitat loss or fragmentation. An example would be the conversion of an existing paved, two-lane undivided road into a four-lane divided highway. The second is the regional importance of wildlife resources in the area, including core habitat needed to sustain wildlife populations into the future as well as movement corridors.

To facilitate our analysis we compiled 22 datasets covering transportation, land management status, including lands designated and managed expressly for conservation purposes, the distribution of important habitats for wildlife, wildlife movement corridors, threatened and endangered species, and areas with important surface waters (see **Appendix B**).

To standardize our assessment, we identified ten types of direct and indirect impacts to wildlife and four assessment categories. The assessment categories indicate the level of impact and whether or not impacts can be offset through mitigation (see **Appendix C**). They include:

1. Segments with limited impacts to wildlife
2. Segments with significant impacts to wildlife but mitigation to offset impacts is feasible
3. Segments with significant impacts to wildlife likely, but mitigation options unlikely to offset impacts
4. Opportunity to improve wildlife linkages

Our transportation system was not originally designed to facilitate daily, seasonal, or annual movement patterns by wildlife. We added a fourth assessment category – opportunity to improve wildlife linkages – to indicate where proposed improvements to existing roadways present an opportunity to improve wildlife passage over existing conditions. This assessment was made using data from the Arizona Game and Fish Department on wildlife linkages. We compared that data to existing roadways for which improvements have been proposed and noted in **Appendix D** the alignments where improvements to wildlife passage and motorist safety should be evaluated. Identification of these opportunities early in the process enables ADOT to evaluate wildlife crossing needs and incorporate design features early in the planning process. Where this has been done elsewhere in the state there have been substantial benefits both to motorist safety and wildlife passage.

We assessed each alignment segment by systematically evaluating wildlife and related resource data layers against the alignment location and change in baseline infrastructure conditions to



determine the importance of the wildlife resource and nature of potential impacts. **Appendix C** shows how the impact criteria relate to the assessment categories. For example, proposed alignments that would have limited direct or indirect impacts to wildlife were indicated as such. In the cases where wildlife habitat loss would result in significant impacts, there are two potential assessments: (1) impacts may be offset through mitigation measures or (2) mitigation measures are unlikely to offset impacts. Significant impacts do not categorically rule out a particular alignment. It's the regional significance of the wildlife resources and the importance of the habitat for the long-term sustainability of wildlife populations that determines whether impacts can be offset.

Finally, **Appendix D** provides our assessment for each proposed alignment along with descriptive information on the nature of impacts and the specific resources that would be impacted.

## Appendix B. List of Datasets Used

### Transportation

- Proposed Segments
  - Provided by ADOT
- Existing Highways and Roads
  - TIGER Rds
  - USGS Topo
- 2009 State Framework

### Ownership/Conservation Lands:

- Military Lands
  - ALRIS, ownership data
- Tribal Lands
  - ALRIS, ownership data

### Protected Areas

- Protected Areas Database v2 (PAD-US), Conservation Biology Institute  
<http://consbio.org/products/projects/pad-us-cbi-edition>

### Important Habitats:

- USFWS Designated Critical Habitat  
<http://criticalhabitat.fws.gov/crithab/>, latest update from USFWS, Feb, 2013

### Important Grasslands

- TNC Grasslands Assessment  
[http://azconservation.org/downloads/category/grassland\\_assessment](http://azconservation.org/downloads/category/grassland_assessment)

### BLM Tortoise Habitat

- Tortoise habitat identified by BLM policy to avoid development or mitigate for

### losses

- Final Report on “Compensation for the Desert Tortoise” Instructional Memorandum, 1991.

### TNC Habitat Conservation Priorities

- TNC Ecoregional Assessments Roll-up, Dec. 2007  
[http://azconservation.org/downloads/category/ecoregional\\_assessment](http://azconservation.org/downloads/category/ecoregional_assessment)

### Pima County Habitat Protection Priorities

- Pima County 2004 Bond- lands identified in the Sonoran Desert Conservation Plan

### Pinal County Existing Open Spaces

- Arizona State Office, Engineering & Mapping Sciences Group, 2008

### Flat-tailed Horned Lizard Management Areas

- Flat-tailed Horned Lizard Interagency Coordinating Committee. 2003. Flat-tailed horned lizard rangewide management strategy, 2003 revision. 78 pp. plus appendices.

### Wildlife Linkages:

- Arizona Missing Linkages (modeled)  
NAU Study 2007-2008

Detailed Linkage Designs (modeled)

AGFD 2012

Pinal Linkages Workshop

AGFD 2013

Arizona Wildlife Linkages Workshop

2006

Black Bear Connectivity Study in the Sky Islands (modeled)

Atwood, Todd C.; Young, Julie K.; Beckmann, Jon P.; Breck, Stewart W.; Fike, Jennifer A.; Rhodes, Jr., Olin; and Bristow, Kirby D., "Modeling Connectivity of Black Bears in a Desert Sky Island Archipelago" (2011). USDA National Wildlife Research Center – Staff Publications. Paper 1013.

[http://digitalcommons.unl.edu/icwdm\\_usdanwrc/1013](http://digitalcommons.unl.edu/icwdm_usdanwrc/1013)

Important Hydrological Features:

Cienegas

TNC Freshwater Assessment,

[http://azconservation.org/downloads/category/freshwater\\_assessment](http://azconservation.org/downloads/category/freshwater_assessment)

Perennial Flows

TNC Freshwater Assessment

[http://azconservation.org/downloads/category/freshwater\\_assessment](http://azconservation.org/downloads/category/freshwater_assessment)

Groundwater basins connected to surface water flow

Anning, D.W., and Konieczki, A.D., 2005. Classification of Hydrogeologic Areas and Hydrogeologic Flow Systems in the Basin and Range Physiographic Province, Southwestern United States. U.S. Geological Survey Professional Paper #1702, 37p.

## Appendix C. Criteria Used to Assess Impacts to Wildlife and Assessment Categories for Proposed Alignments

		Assessment Categories			
		Significant Impacts to Wildlife Likely - Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely – Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife
<b>Direct Impacts to Wildlife and Wildlife Habitat</b>					
1.	Habitat loss or fragmentation for Threatened and Endangered or special status species	X	X		
2.	Habitat loss or fragmentation for core wildlife habitat not represented or limited elsewhere in state	X	X		
3.	Habitat loss or fragmentation for area acquired and/or managed for conservation purposes	X	X		
4.	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept.	X	X	X	
5.	Direct impacts limited			X	X
<b>Indirect Impacts to Wildlife and Wildlife Habitat</b>					
6.	Adverse impacts to wildlife and habitat from incompatible activities (e.g., development, groundwater pumping)	X	X		
7.	Adverse impact to habitat acquired or identified for mitigation purposes	X	X		
8.	Adverse impacts to surface waters designated as “Outstanding Waters/Wild or Scenic Rivers”	X	X		
9.	Limits or precludes habitat management options such as use of controlled fire	X	X		
10.	Indirect impacts limited				X

**Appendix D.** Detailed Evaluation of Proposed I-11 Alignments, Including Overall Assessment and Supporting Information, Organized by Assessment Category and Location of Proposed Alignments

***I. Segments with Limited Impacts to Wildlife***

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Phoenix Alignments						
Segment 24 & 21 – South Mtn Freeway/I10/SR101 and I-10	State highways and U.S. interstate to U.S. interstate				X	Direct impacts limited
Segments 25 & 26 – US 60	State highways to U.S. interstate				x	Direct impacts limited
Segment 85 – SR 30	State highway to U.S. interstate				X	Direct impacts limited

## II. Segments where there are Opportunities to Improve Wildlife Linkages

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Northern Arizona Alignments						
Segment 35 & 90 – I-40	U.S. highway to U.S. interstate			X		Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Warm Springs- Hualapai Mtns, Warm Springs – Aubrey Peak, Hualapai – Cerbat)
Segment 36 – US 93	U.S. highway to U.S. interstate			X		Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Hualapai Mtns – Bagdad; Tres Alamos Wilderness – Prescott National Forest)
Segment 39 – SR 89	State highway to U.S. interstate			X		Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Big Black Mesa – Hell Canyon)
Segment 40 – I-17	U.S. interstate to U.S. interstate			X	X	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Northern I17 Corridor)

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segments 41,42,43 – I-40	U.S. interstate to U.S. interstate			X	X	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (I40- 93 – Kingman; Grand Canyon – Prescott National Forest; Garland – Arizona Divide; Hualapai - Cerbat)
Segments 44 & 45 -SR 68	State highway to U.S. interstate			X		Habitat loss or fragmentation for area acquired and/or managed for conservation purposes (Black Mountains ACEC)  Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Hualapai-Cerbat; Mount Perkins – Warm Springs)
Segment 46 – US 93	U.S. highway to U.S. interstate			X		Habitat loss or fragmentation for wildlife linkage (Mount Tipton – Mount Perkins; Black Mts - Cerbat)
Segment 95 – US 93	U.S. highway to U.S. interstate			X		Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Hualapai Mtns – Bagdad; I-40-US 93- Kingman)
Phoenix Alignments						

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segments 10 & 83 - I-8	U.S. interstate to U.S. interstate			X	X	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Vekol Wash, Estrella Mtns- Vekol Wash, Table Top Mtns – Little Table Top Mtns, Maricopa Mtns- Table Top Mtns; South Maricopa Mtns – Sand Tanks; Gila River – Lake Saint Claire; Greene Wash and Reservoir)
Segments 11 & 12 - I10	U.S. interstate to U.S. interstate			X	X	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Gila River; Queen Creek to Gila River Indian Community)
Segment 13 I10/I17	U.S. interstate to U.S. interstate			X	X	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Gila – Salt River Corridor Granite Reef Dam)
Segments 19,20 – SR-85	State highway to U.S. interstate			X	X	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Gila Bend – Sierra Estrella)
Segment 27 – US 60	State highway to U.S. interstate			X	X	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Harcuvar Mtns – Harquahala Mtns; Granite Wash – Little Harquahala Mtns; Ranegras Plain; Wickenburg-Hassayampa)



Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segment 28 & 89 – I-17	U.S. interstate to U.S. interstate			X	X	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Bradshaw Mtns – Agua Fria National Monument)
Segment 29 – US93	State highway to U.S. interstate			X	x	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Chino Valley; Wickenburg-Hassayampa; White Tanks – Belmonts – Vultures - Hieroglyphics)
<b>Southern Arizona Alignments</b>						
Segment 1 – SR 191 Douglas Connection	U.S. highway to U.S. interstate			X		Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Black Bear Linkage Study)
Segments 2,4,6,8 - I-10	U.S. interstate to U.S. interstate			X	X	Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept.
Segment 5 – I-19 Nogales Connection	U.S. interstate to U.S. interstate			X		Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Tumacacori-Santa Rita; Santa Rita-Sierrita, Black Bear Linkage Study)
Segment 79 – I-8	U.S. interstate to U.S. interstate			X		Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept (for Bighorn Sheep and Sonoran Pronghorn; Sentinel Plain)

### III. Segments where Significant Impacts to Wildlife are Likely but Mitigation to Offset Impacts is Feasible

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Northern Arizona Alignments						
Segments 30 & 33 – SR 95	State highway to U.S. interstate		X			Habitat loss or fragmentation for area acquired and/or managed for conservation purposes (Bill Williams National Wildlife Refuge)  Habitat loss or fragmentation for Threatened and Endangered or special status species (direct impact to Southwestern Willow Flycatcher; indirect impact to critical aquatic and breeding habitat for Bonytail Chub, Razorback Sucker)  Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (for bighorn sheep; Bill Williams – Aubrey Hills; The Needles – Mohave Mtns)
Segment 34 – SR 95 Realignment	Rural roads to U.S. interstate		X			Adverse impact to habitat acquired or identified for mitigation purposes (BLM habitat designated for desert tortoise management, mitigation required if impacted)  Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Mount Perkins – Warm Springs)

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segment 91 – Chicken Springs Rd	Minor road to U.S. interstate		X			<p>Adverse impact to habitat acquired or identified for mitigation purposes (BLM habitat designated for desert tortoise management, mitigation required if impacted)</p> <p>Adverse impacts to wildlife and habitat from incompatible activities (e.g., development, groundwater pumping; impacts to Big Sandy River, Lower Bill Williams River Basins where groundwater is connected to surface flows)</p>
Phoenix Alignments						
Segments 14,15,16,17,18, 84, 86 – Hassayampa Freeway	New construction & minor roads to U.S. interstate		X	X		<p>Adverse impact to habitat acquired or identified for mitigation purposes (BLM habitat designated for desert tortoise management, mitigation required if impacted)</p> <p>Habitat loss or fragmentation for wildlife linkage area identified by AZ Game &amp; Fish Dept. (White Tanks – Belmonts – Vultures – Hieroglyphics; Wickenburg – Hassayampa; Gila Bend – Sierra Estrella)</p> <p>Indirect effects possible to the Vulture Mountains Recreational Area, a planned regional park in Maricopa County, that would include TNC's Hassayampa River Preserve</p>

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segment 22 – Sun Valley Pkwy	New construction & minor roads to U.S. interstate		X			Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (White Tanks – Belmonts – Hieroglyphics)
Segment 23,87,88– SR 303	New construction & state highway to U.S. interstate		X	X		Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept.(in Rainbow Valley for bighorn sheep; Gila/Salt River Corridor Granite Reef Dam; Gila River; North Maricopa Mtns – Sierra Estrella Mtns)
Segment 82 – SR 303 Ext – Vekol Valley	New construction & minor roads to U.S. interstate		X	X		Adverse impact to habitat acquired or identified for mitigation purposes (BLM habitat designated for desert tortoise management, mitigation required if impacted)  Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Vekol Wash, Estrella Mtns- Vekol Wash, Sonoran Desert National Monument-Palo Verde Hills, Maricopa Mtns- Table Top Mtns)

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Southern Arizona Alignments						

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segment 3 – Naco Connection	State highway to U.S. interstate; possible new construction		X			<p>Adverse impacts depend upon the specific alignment and access points and range from impacts that could be offset by mitigation to those that are unlikely to be offset by mitigation.</p> <p>Adverse impacts to areas acquired and/or managed for conservation purposes (San Pedro River NCA; properties owned by The Nature Conservancy); Habitat loss or fragmentation for Threatened and Endangered or special status species (indirect impact to critical aquatic habitat for Huachuca water umbel)</p> <p>Habitat loss or fragmentation for wildlife linkage area identified by AZ Game &amp; Fish Dept. (Ft. Huachuca, Whetstones –San Pedro, Black Bear Linkage Study)</p> <p><b>Note:</b> New development and associated groundwater pumping facilitated by a new transportation corridor <i>within the Upper San Pedro River Basin</i> would have adverse impacts to wildlife and habitat on the San Pedro River. Given the current status of groundwater and surface flows and efforts to mitigate for existing conditions in the Upper San Pedro, we believe that mitigation would not be feasible to offset impacts associated with a new transportation corridor.</p>

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segments 9, 80 – I-95 & San Luis Connection	State highway to U.S. interstate		X	X		<p>Habitat loss or fragmentation for Threatened and Endangered or special status species (Yuma desert management area for flat-tailed horn lizard, a special status species)</p> <p>Habitat loss or fragmentation for wildlife linkage area identified by AZ Game &amp; Fish Dept. (for bighorn sheep and mule deer, Trigo Mtns – Kofa Mtns)</p>

**IV. Segments where Significant Impacts to Wildlife are Likely but Mitigation Unlikely to Offset Impacts**

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Northern Arizona Alignments						
Segment 37 – Chino Valley	New construction	X				Habitat loss or fragmentation for core wildlife habitat not represented or limited elsewhere in state (GMU 19b is core habitat for one of largest state populations of pronghorn and intact grasslands)  Adverse impacts to wildlife and habitat from incompatible activities (e.g., development, groundwater pumping; impacts to Big Chino and Kirkland Creek Basins where groundwater is connected to surface flows linked to Williamson Valley Wash and the Verde River)  Habitat loss or fragmentation for wildlife linkage area identified by AZ Game & Fish Dept. (Granite Mts – Black Hills)



Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segments 38,92,93– I17 Fain Road Connector	New construction & state highway to U.S. interstate	X				<p>Habitat loss or fragmentation for core wildlife habitat not represented or limited elsewhere in state (GMU 19b is core habitat for one of largest state populations of pronghorn and intact grasslands)</p> <p>Adverse impacts to wildlife and habitat from incompatible activities (e.g., development, groundwater pumping; impacts the Little Chino Basin where groundwater is connected to surface flows linked to the Verde River)</p> <p>Habitat loss or fragmentation for wildlife linkage area identified by AZ Game &amp; Fish Dept. (Granite Mtns – Black Hills)</p>

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segment 94	New construction	X				<p>Habitat loss or fragmentation for area acquired and/or managed for conservation purposes (Burro Creek Riparian and Cultural ACEC, Upper Burro Creek wilderness BLM)</p> <p>Adverse impacts to wildlife and habitat from incompatible activities (e.g., development, groundwater pumping; impacts the Burro Creek, Big Sandy River, Big Chino and Kirkland Creek Basins where groundwater is connected to surface flows linked to the Williamson Valley Wash and the Verde River)</p> <p>Habitat loss or fragmentation for core wildlife habitat not represented or limited elsewhere in state (grasslands, perennial surface waters- Burro Creek, Frances Creek- home to 5-6 native fish species)</p>
Southern Arizona Alignments						

Proposed Segment	Proposed Change in Infrastructure	Assessment				Description
		Significant Impacts to Wildlife Likely-Mitigation Unlikely to Offset Impacts	Significant Impacts to Wildlife Likely-Mitigation Feasible	Opportunity to Improve Wildlife Linkages	Limited Impacts to Wildlife	
Segment 7 – Sasabe Connection	State highway to U.S. interstate	X				<p>Habitat loss or fragmentation for area acquired and/or managed for conservation purposes (Buenos Aires NWR, Pima Co. Conservation Areas, Ironwood National Monument)</p> <p>Habitat loss or fragmentation for wildlife linkage area identified by AZ Game &amp; Fish Dept. (Mexico – Tumacacori – Baboquivari, Coyote – Ironwood – Tucson)</p> <p>Adverse impact to habitat acquired or identified for mitigation purposes (Central Arizona Project mitigation corridor)</p>
Segment 81 – SR-85	State highway to U.S. interstate	X				<p>Habitat loss or fragmentation for area acquired and/or managed for conservation purposes (Organ Pipe National Monument, Cabeza Prieta National Wildlife Refuge; military land with high integrity conservation lands in the Barry Goldwater Range)</p> <p>Habitat loss or fragmentation for wildlife linkage area identified by AZ Game &amp; Fish Dept. (SR85 – Sonoran Pronghorn)</p> <p>Habitat loss or fragmentation for Threatened and Endangered or special status species (Sonoran Pronghorn)</p>

December 6, 2013

Michael [REDACTED]  
Director of Planning and Programming  
Arizona Department of Transportation  
206 S. 17<sup>th</sup> Avenue, Mail Drop: 310B  
Phoenix, AZ 85007

Dear Mr. [REDACTED]

On behalf of The Nature Conservancy in Arizona, thank you for the opportunity to provide level 2 comments on the proposed *Interstate 11 Corridor-Wide Alignment Alternatives*. Our analysis and comments are focused on assisting with the Level 2 Planning and Environment Linkage review (PEL), specifically on describing impacts and identifying options for offsetting impacts. Use of the PEL process represents a significant advancement towards more integrated infrastructure planning, which should yield better planning tools and improvement in project delivery times while avoiding and minimizing impacts to natural resources.

Detailed comments and our evaluation for each alignment, as well as supporting materials such as analytical methods, assessment criteria, and map of the alignments evaluated, are provided in **Appendices A-E** (attached). Below is a brief summary of our findings.

We systematically evaluated 23 proposed segments for the Arizona portion of I-11. Of those, we concluded that two segments (9%) would have limited impacts to wildlife and water resources; 10 of the segments (43%) present opportunities to improve both motorist safety and passage of wildlife around existing roadways using practices already adopted by the Arizona Department of Transportation; and 6 segments (26%) would have significant impacts to wildlife or water resources that could be offset through mitigation measures.

Only five segments (22%) were identified as having significant impacts that would be difficult or infeasible to offset with mitigation measures. These alignments would result in significant habitat loss or degradation, adversely impact Threatened and Endangered or special status species, adversely impact wildlife in areas acquired, designated, and managed for conservation purposes, adversely impact wildlife and habitat not well represented elsewhere in the state and necessary to ensure that populations remain sustainable into the future, or adversely impact perennial surface waters and riparian areas important to wildlife.

From a conservation standpoint the segments of most concern are those that include the construction of new routes and those that would expand existing infrastructure in proximity to perennial surface water and riparian habitat. We recommend the following segments be avoided: Chicken Springs Road (#91), segment 82 in the Vekol Valley, and segments 17, 22, and 29 west of Phoenix. If alternatives to segments 17, 22, and 29 are not feasible, there are more opportunities to minimize impacts for segments 17-18 than for 22-29 because of the greater distance of segments 17-18 from perennial surface water and riparian habitat. In some cases, expansion of existing routes would result in considerably less environmental impact than routes requiring new construction. For example, segments 95-43 are preferred over 91-35, and segments 10-83-19 are preferred over 14-84-15-86.

In the supporting materials, we provide information regarding options to offset impacts, including working with BLM's Desert Tortoise Mitigation Policy. There are additional opportunities to provide off-site compensation for loss of native habitat across the regional scale, including Arizona Game & Fish Department's Wildlife and Wildlife Habitat Compensation Policy, Federal Highway Administration's Eco-logical Framework, and new guidelines and policies from the Department of Interior and the Bureau of Land Management on regional mitigation. We would be happy to work with you and other partner agencies on data and tools that can be used to help evaluate and implement these opportunities.

If you have questions regarding our recommendations or the background information, please do not hesitate to contact me. I can be reached at [rmarshall@tnc.org](mailto:rmarshall@tnc.org) or 520-237-8778.

Sincerely,

[Redacted signature]

[Redacted name]

Cc:

Governor [Redacted]

Congressman [Redacted]

[Redacted] Director, Arizona Game & Fish Department

[Redacted] Executive Director Interstate 11 Coalition

## Appendix A. Methods and Criteria

We designed our analysis to facilitate the purposes of the Level 2 PEL review, namely to complete a quantitative analysis of potential impacts of the proposed segments on environmentally sensitive areas, and to identify potential mitigation strategies and opportunities to offset impacts where they are unavoidable.

Two primary factors were used to distinguish the scope and magnitude of potential impacts. The first is the change in baseline infrastructure conditions for the proposed segment, which is necessary to determine the magnitude of impacts, such as habitat loss or fragmentation, relative to current conditions. In order to do this, we categorized all segments into one of three groups: existing, expand, and new. Those segments characterized as 'existing' include all interstates and divided limited-access highways. We classified segments as 'expand' for those areas with paved road infrastructure that would need to be expanded in order to accommodate the requirements of a multi-modal corridor. 'New' segments would require construction of paved roads in area with minimal infrastructure (e.g., unimproved dirt roads or trails).

**Appendix B** is a map of the proposed segments shown by these categories.

The second factor is to quantify the potential direct and indirect impacts to wildlife resources of regional importance in the area. We evaluated potential impacts of the proposed segments on 9 conservation and wildlife criteria. These criteria were developed to correspond with Level 2 "environmental sustainability" criteria established for this corridor study. Specifically, we quantified adverse direct or indirect impacts to:

1. ESA species
2. BLM Desert Tortoise Lands
3. Areas managed for conservation purposes
4. Core wildlife habitat not represented or limited elsewhere in state
5. Perennial surface waters important to wildlife
6. Relatively intact riparian and xero-riparian habitat
7. Relatively intact Sonoran Desert Habitat
8. Relatively intact Mojave Desert Habitat
9. Wildlife Corridor/Linkage or Unfragmented Habitat Blocks

Using the best available data for these resources (see **Appendix C** for a list of these data sets), we quantified direct impacts within 1000 feet (500 foot buffer either side) of the proposed segments and indirect impacts within 2000 meters (1000 meter buffer either side, drawn beyond the direct impacts buffer). Following Council of Environmental Quality criteria<sup>1</sup>, we define direct effects/impacts as those "...that are caused by the action and occur at the same time and place", and indirect effects/impacts as those "...that are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable", including indirect effects on urban and suburban growth patterns. This distance of 1000 feet for direct impacts was chosen based on consultations with ADOT on the probable width that would be

impacted with construction or other activities. We estimated indirect impacts within 2000 meters of the segment based on field research of threatened desert tortoises in the Mojave Desert<sup>2</sup> and a global analysis of birds<sup>3</sup> that indicate that these animals avoid or exhibit lower population densities within 1000 meters of roads. The effects zone for mammals has been measured to much larger distances<sup>3</sup> and we elected to evaluate this effect using data related to the fragmentation effect of road construction (i.e., linkages and unfragmented blocks). We note that these distances are preliminary and subject to change once more precise alignments are drawn. Their primary value is to offer a comparative analysis of the impact of segments relative to one another.

To standardize our assessment, we evaluated all of these impacts in relation to the regional importance of the resource and the feasibility of offsetting impacts. **Appendix D** summarizes our impacts assessment, sorting segments with the least impacts to the most impacts. It allows for a direct comparison of the potential impact of each segment in relation to one another. The last column in Appendix D also provides our recommendation in terms of mitigation strategies and opportunities to offset impacts. For example, proposed alignments that would have limited direct or indirect impacts to wildlife were indicated as such. In the cases where wildlife habitat loss would result in significant impacts, there are two potential assessments: (1) impacts may be offset through mitigation measures or (2) mitigation measures are unlikely to offset impacts. Significant impacts do not categorically rule out a particular alignment. It's the regional significance of the wildlife resources and the importance of the habitat for the long-term sustainability of wildlife populations that determines whether impacts can be offset. Given that our transportation system was not originally designed to facilitate movement patterns by wildlife, we also indicate which segments present an opportunity to improve wildlife passage over existing conditions. This assessment was made using data from the Arizona Game and Fish Department on wildlife linkages.

Categories in **Appendix D** include:

1. Segments with **limited impacts** to wildlife
2. Segments with opportunities to **study and/or improve wildlife linkages**
3. Segments with significant impacts to wildlife but where options to **minimize and/or offset** these impacts are feasible
4. Segments with significant impacts to wildlife that should be **avoided** because mitigation options are unlikely to offset impacts

**Appendix E** provides a more descriptive narrative for each segment, summarizing the nature of the impacts, including specific resources that would be impacted, and options and opportunities to avoid these impacts or minimize and offset where impacts are unavoidable.

## References

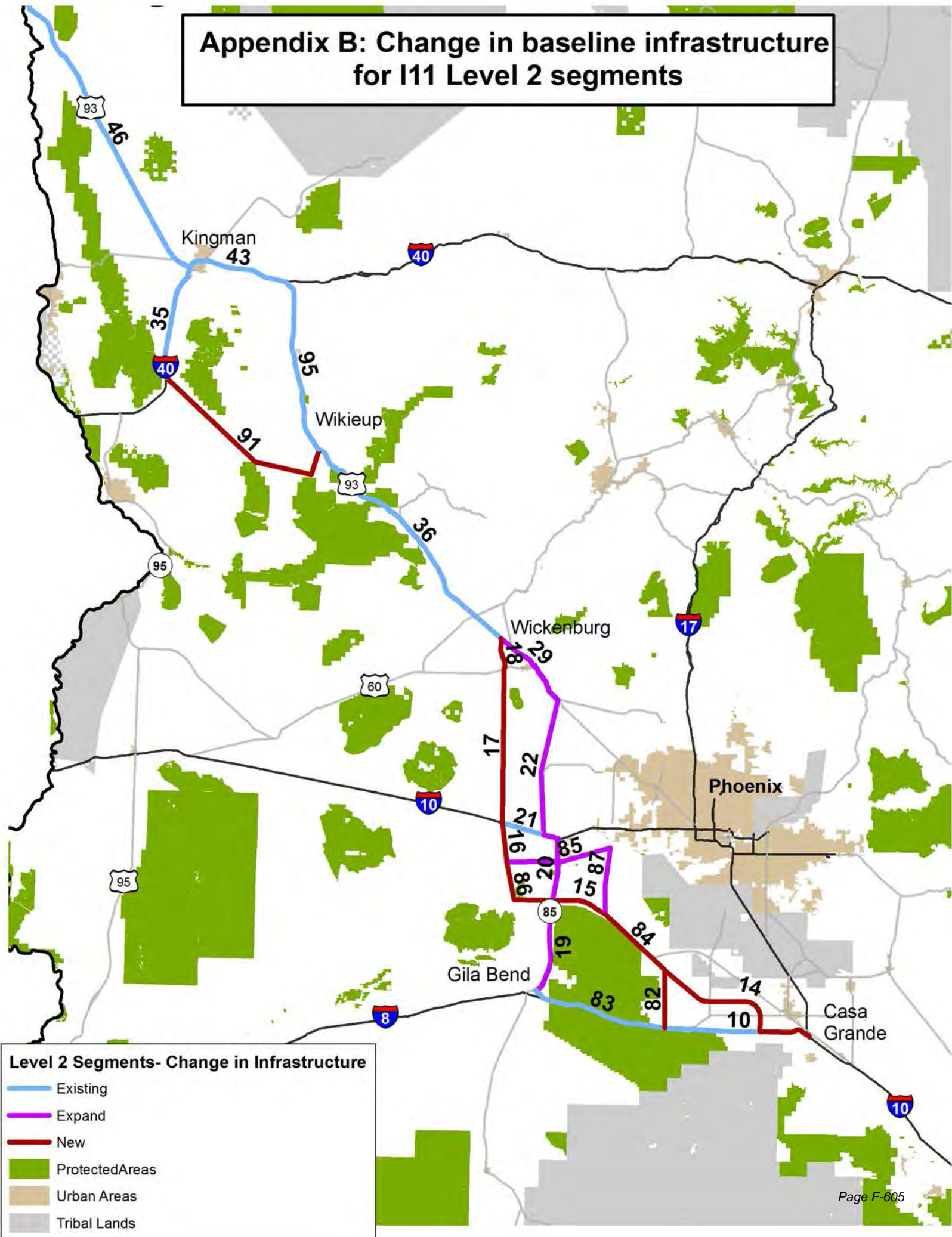
<sup>1</sup>Council for Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR §§ 1500-1508.

<sup>2</sup>Borman, WI and M Sazaki. 2006. A highway's road-effect zone for desert tortoises (*Gopherus agassizii*). *Journal of Arid Environments* 65: 94-101.

<sup>3</sup>Benitez-Lopez A, R Alkemade, and PA Verweij. 2010. The impacts of roads and other infrastructure on mammal and bird populations: A meta-analysis. *Biological Conservation* 143: 1307-1316.



## Appendix B: Change in baseline infrastructure for I11 Level 2 segments



## Appendix C. Definitions of Resource Criteria and List of Source Datasets

- 1) **ESA Species:** Species with following statuses under Endangered Species Act: Endangered, Threatened, Candidate, or Proposed
  - a. USFWS Designated Critical Habitat; <http://criticalhabitat.fws.gov/crithab/>, latest update from USFWS, Feb, 2013
  - b. Heritage Data Management System, data requested from AGFD, Nov 2013
- 2) **BLM Desert Tortoise Lands:** Category 1 and 2 lands under BLM Desert Tortoise Mitigation Policy to avoid development or mitigate for losses.
  - a. Updated GIS data requested from BLM, Nov 2013
  - b. Tortoise habitat identified by BLM policy to avoid development or mitigate for losses; Final Report on “Compensation for the Desert Tortoise” Instructional Memorandum, 1991.
- 3) **Areas managed for conservation purposes**
  - a. Protected Areas Database v2 (PAD-US), Conservation Biology Institute; <http://consbio.org/products/projects/pad-us-cbi-edition>
- 4) **Core wildlife habitat not represented or limited elsewhere in state**
  - a. TNC Grasslands Assessment; [http://azconservation.org/downloads/category/grassland\\_assessment](http://azconservation.org/downloads/category/grassland_assessment)
  - b. TNC Habitat Conservation Priorities; TNC Ecoregional Assessments Roll-up, Dec. 2007; [http://azconservation.org/downloads/category/ecoregional\\_assessment](http://azconservation.org/downloads/category/ecoregional_assessment)
- 5) **Perennial surface waters important to wildlife**
  - a. TNC Freshwater Assessment; [http://azconservation.org/downloads/category/freshwater\\_assessment](http://azconservation.org/downloads/category/freshwater_assessment)
  - b. Groundwater basins connected to surface water flow; Anning, D.W., and Konieczki, A.D., 2005. Classification of Hydrogeologic Areas and Hydrogeologic Flow Systems in the Basin and Range Physiographic Province, Southwestern United States. U.S. Geological Survey Professional Paper #1702, 37p.
- 6) **Relatively intact riparian and xero-riparian habitat:** Identified for segments where majority of lands within direct impact buffer (1000 feet) are relatively intact (areal extent of human use <25%).
  - a. USGS ReGAP vegetation data, modified by AGFD for SWAP, 2010
  - b. TNC Human Use Intensity dataset, 2013
- 7) **Relatively intact Sonoran Desert Habitat:** Identified for segments where majority of lands within direct impact buffer (1000 feet) are relatively intact (areal extent of human use <25%).
  - a. USGS ReGAP vegetation data, modified by AGFD for SWAP, 2010
  - b. TNC Human Use Intensity dataset, 2013
- 8) **Relatively intact Mojave Desert Habitat:** Identified for segments where majority of lands within direct impact buffer (1000 feet) are relatively intact (areal extent of human use <25%).

- a. USGS ReGAP vegetation data, modified by AGFD for SWAP, 2010
  - b. TNC Human Use Intensity dataset, 2013
- 9) Wildlife Corridor/Linkage or Unfragmented Habitat Block:** Wildlife corridors are identified from sources (a-c) below. Unfragmented habitat blocks are contiguous blocks of native habitat with highest landscape integrity (areal extent of human use <5%) (TNC 2013).
- a. Arizona Missing Linkages (modeled); NAU Study 2007-2008
  - b. Detailed Linkage Designs (modeled); AGFD 2012
  - c. County Level Linkage Assessments; AGFD,  
[http://www.azgfd.gov/w\\_c/conn\\_whatGFDdoing.shtml](http://www.azgfd.gov/w_c/conn_whatGFDdoing.shtml))
  - d. TNC Human Use Intensity dataset, 2013

**Appendix D.** Criteria Used to Assess Impacts and Evaluate Options to Offset Impacts for Proposed Level II Segments. Green boxes indicate direct impacts found; cross-hatching indicates indirect impacts. Segments are sorted by 'Options to Offset' and then geographically from North to South.

Segment #	Segment Name	Segment Type	ESA Species	BLM Desert Tortoise Lands	Conservation Managed Area	Core/Limited Wildlife Habitat	Perennial Surface Waters	Riparian/Xero-Riparian Habitat	Sonoran Desert Habitat	Mojave Desert Habitat	Linkage/Unfrag. Habitat	Options to Offset
21	I-10	Existing										Impacts Limited
16	Hassy Fwy	New										Impacts Limited
46	US 93	Existing										Wildlife Linkages
43	I-40	Existing										Wildlife Linkages
95	US 93	Existing										Wildlife Linkages
35	I-40	Existing										Wildlife Linkages
36	US 93	Existing										Wildlife Linkages
87	SR 303	Expand										Wildlife Linkages
19	SR85	Expand										Wildlife Linkages
14	Hassy Fwy	New										Wildlife Linkages
83	I-8	Existing										Wildlife Linkages
10	I-8	Existing										Wildlife Linkages
18	Hassy Fwy	New										Minimize & Offset
20	SR85	Expand										Minimize & Offset
85	SR 30	Expand										Minimize & Offset
86	Hassy Fwy	New										Minimize & Offset
15	Hassy Fwy	New										Minimize & Offset
84	Hassy Fwy	New										Minimize & Offset
91	Chicken Sprs	New										Avoid
29	Hwy 60	Expand										Avoid
22	Sun Valley P	New/ Expand										Avoid
17	Hassy Fwy	New										Avoid
82	Vekol Valley	New										Avoid

**Appendix E.** Detailed Evaluation of Proposed I-11 Alignments, Including Overall Impact Assessment and Options for Offsetting impacts. Segments are sorted by recommended option, then from North to South.

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
21	I-10 (9 miles)	Existing	N				X	Minimal new impacts.
16	Hassayampa Freeway (12 miles)	New	N				X	Minimal new impacts.
46	US 93 (70 miles)	Existing	Y		X	X		<p>Opportunity to study and improve wildlife linkages. This segment is in Mohave County, which has not yet completed a County-level Stakeholder Assessment; additional studies for wildlife connectivity are advised.</p> <p><b>Note:</b> If the new multi-modal footprint is significantly greater than the existing highway, habitat loss or degradation to ESA Endangered and Candidate species, Bonytail Chub, Razorback Sucker and Sonoran Desert Tortoise, could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
43	I-40 (23 miles)	Existing	Y		X	X		<p>Opportunity to study and improve wildlife linkages. This segment is in Mohave County, which has not yet completed a County-level Stakeholder Assessment; additional studies for wildlife connectivity are advised.</p> <p><b>Comparison:</b> Segments 95 &amp; 43 have fewer impacts than 91 &amp; 35. Existing routes offer transportation connectivity with less impact.</p> <p><b>Note:</b> If the new multi-modal footprint is significantly greater than the existing interstate, habitat loss or degradation to Candidate species, Sonoran Desert Tortoise, could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
95	US 93 (32 miles)	Existing	Y		X	X		<p>Opportunity to study and improve wildlife linkages. This segment is in Mohave County, which has not yet completed a County-level Stakeholder Assessment; additional studies for wildlife connectivity are advised.</p> <p><b>Comparison:</b> Segments 95 &amp; 43 have fewer impacts than 91 &amp; 35. Existing routes offer transportation connectivity with less impact.</p> <p><b>Note:</b> If the new multi-modal footprint is significantly greater than the existing highway, habitat loss or degradation to ESA Candidate species, Sonoran Desert Tortoise, and to an area acquired and/or managed for conservation purposes (Carrow-Stephens Ranches ACEC) could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
35	I-40 (25 miles)	Existing	Y		X	X		<p>Opportunity to study and improve wildlife linkages. This segment is in Mohave County, which has not yet completed a County-level Stakeholder Assessment; additional studies for wildlife connectivity are advised.</p> <p><b>Comparison:</b> Segments 95 &amp; 43 have fewer impacts than 91 &amp; 35. Existing routes offer transportation connectivity with less impact.</p> <p><b>Note:</b> If the new multi-modal footprint is significantly greater than the existing interstate, habitat loss or degradation to Candidate species, Sonoran Desert Tortoise, could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p>



Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
36	US 93 (65 miles)	Existing	Y		X	X		<p>Opportunity to study and improve wildlife linkages.</p> <p><b>Note:</b> This segment traverses the groundwater basin supporting perennial surface flows in Burro Creek, Big Sandy River, Santa Maria River and Upper Hassayampa River. The Water Resources Development Commission in 2011 (WRDC 2011) found that water demand in the Hassayampa basin would exceed supplies by 2035 under a low-growth scenario. Given the current status of groundwater and surface flows in the Hassayampa basin, additional development and associated groundwater pumping facilitated by a new transportation corridor would increase impacts to wildlife and habitat above baseline conditions assessed by the WRDC. Given the rarity of perennial surface water, riparian habitat, and associated wildlife, it would be difficult if not infeasible to offset impacts through mitigation measures.</p> <p>Additionally, if the new multi-modal footprint is significantly greater than the existing highway, habitat loss or degradation to ESA Endangered and Candidate Species, Southwestern Willow Flycatcher, Roundtail Chub, and Sonoran Desert Tortoise, and to areas acquired and/or managed for conservation purposes (Burro Creek and Poachie Desert Tortoise ACECs) are likely to occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
87	SR 303 (14 miles)	Expand	N			X		Opportunity to study and improve wildlife linkages.
19	SR-85 (21 miles)	Expand	Y		X	X		<p>Opportunity to study and improve wildlife linkages.</p> <p><b>Comparison:</b> Segments 10, 83, &amp; 19 have fewer impacts than 14, 82, 84, &amp; 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.</p> <p><b>Note:</b> If the new multi-modal footprint is significantly greater than the existing highway, habitat loss or degradation to ESA Candidate species, Tucson-Shovel-nosed Snake, and to desert tortoise habitat could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p>
14	Hassayampa Freeway (32 miles)	New	N			X		<p>Opportunity to study and improve wildlife linkages.</p> <p><b>Comparison:</b> Segments 10, 83, &amp; 19 have fewer impacts than 14, 82, 84, &amp; 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
83	I-8 (29 miles)	Existing	Y		X	X		<p>Opportunity to study and improve wildlife linkages.</p> <p><b>Comparison:</b> Segments 10, 83, &amp; 19 have fewer impacts than 14, 82, 84, &amp; 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.</p> <p><b>Note:</b> If the new multi-modal footprint is significantly greater than the existing interstate, habitat loss or degradation to ESA Candidate species, Sonoran Desert Tortoise, could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
10	I-8 (33 miles)	Existing	Y		X	X		<p>Opportunity to study and improve wildlife linkages.</p> <p><b>Comparison:</b> Segments 10, 83, &amp; 19 have fewer impacts than 14, 82, 84, &amp; 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.</p> <p><b>Note:</b> If the new multi-modal footprint is significantly greater than the existing interstate, habitat loss or degradation to ESA Candidate species, Sonoran Desert Tortoise, could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
18	Hassayampa Freeway (7 miles)	New	N		X	X		<p>We recommend minimizing and offsetting impacts for this segment, including conducting studies to improve wildlife linkages.</p> <p><b>Comparison:</b> Segments 17 &amp; 18 have fewer impacts than 22 &amp; 29. There are options to offset impacts to habitat resources in the 17/18 area, whereas impacts to rivers and riparian areas along the segment 29 route would be difficult to offset.</p> <p><b>Note:</b> This segment traverses the groundwater basin supporting the Hassayampa River near Wickenburg. The Water Resources Development Commission in 2011 found that water demand in the basin would exceed supplies by 2035 under a low-growth scenario. Given the current status of groundwater and surface flows in the Hassayampa basin, additional development and associated groundwater pumping facilitated by a new transportation corridor would increase impacts to wildlife and habitat above baseline conditions assessed by the WRDC. Given the rarity of perennial surface water, riparian habitat, and associated wildlife, it would be difficult if not infeasible to offset impacts through mitigation measures.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
20	SR-85 (17 miles)	Expand	Y		X	X		<p>We recommend minimizing and offsetting impacts for this segment, including conducting studies to improve wildlife linkages.</p> <p>Habitat loss or degradation to ESA Endangered and Proposed Threatened species, Yuma Clapper Rail and Western Yellow-Billed Cuckoo, to desert tortoise habitat, and to areas acquired and/or managed for conservation purposes (Gila River and Robbins Butte Wildlife Areas) could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p>
85	SR 30 (23 miles)	Expand	Y		X	X		<p>We recommend minimizing and offsetting impacts for this segment, including conducting studies to improve wildlife linkages.</p> <p>Habitat loss or degradation to ESA Endangered and Proposed Threatened species, Yuma Clapper Rail and Western Yellow-Billed Cuckoo, could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
86	Hassayampa Freeway (16 miles)	New	Y		X	X		<p>We recommend minimizing and offsetting impacts for this segment and also conducting studies to improve wildlife linkages.</p> <p>The level of new construction required to establish an interstate along this segment would result in habitat loss or degradation to ESA Endangered and Candidate species, Southwestern Willow Flycatcher, Yuma Clapper Rail and Sonoran Desert Tortoise, to areas acquired and/or managed for conservation purposes (Arlington and Powers Butte Wildlife Areas), and to native habitat, in particular riparian, xero-riparian, and Sonoran Desert habitats could occur. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
15	Hassayampa Freeway (12 miles)	New	Y		X	X		<p>We recommend minimizing and offsetting impacts for this segment and also conducting studies to improve wildlife linkages.</p> <p><b>Comparison:</b> Segments 10, 83, &amp; 19 have fewer impacts than 14, 82, 84, &amp; 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.</p> <p>The level of new construction required to establish an interstate along this segment could result in habitat loss or degradation to desert tortoise habitat and native habitat, in particular riparian, xero-riparian, and Sonoran Desert habitats. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy. Additionally, new construction would have the effect of isolating wildlife populations in the northern portion of the Sonoran Desert National Monument (i.e., north of I-8), from the critical native habitats in Buckeye Hills. The extent of this effect and options for restoring connectivity should be carefully studied.</p>



Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
84	Hassayampa Freeway (19 miles)	New	Y		X	X		<p>We recommend minimizing and offsetting impacts for this segment and also conducting studies to improve wildlife linkages.</p> <p><b>Comparison:</b> Segments 10, 83, &amp; 19 have fewer impacts than 14, 82, 84, &amp; 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.</p> <p>The level of new construction required to establish an interstate along this segment could result in habitat loss or degradation to native habitat, in particular xero-riparian and Sonoran Desert habitats and to ESA Candidate species, Sonoran Desert Tortoise. If these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p> <p>Construction of an interstate along this route would the effect of isolating wildlife populations in the northern portion of the Sonoran Desert National Monument (i.e., north of I-8), from the critical native habitats in Buckeye Hills. The extent of this effect and options for restoring connectivity should be carefully studied.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
91	Chicken Springs Rd (42 miles)	New	Y	X	X			<p>We recommend that the construction of an interstate along this segment should be avoided because of the direct and indirect impacts to the resources in this area cannot be adequately mitigated. If, however, these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation, including conducting studies to improve wildlife linkages. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p> <p><b>Comparison:</b> Segments 95 &amp; 43 have fewer impacts than 91 &amp; 35. Existing routes offer transportation connectivity with less impact.</p> <p>Construction of an interstate along this segment would fragment an area of regional importance, at 357,760 acres representing the 11<sup>th</sup> largest unfragmented intact area in the state and the 4<sup>th</sup> largest in the Apache Highlands (TNC 2013). This area also straddles the boundaries of three ecoregions (Apache Highlands, Sonoran Desert, Mojave Desert), indicating its importance to landscape scale habitat connectivity and potentially to resilience. This segment would also fragment two areas identified as ecologically core areas in the 2010 TNC Mojave Desert Ecoregional Assessment (Randall et al. 2010). Habitat loss or degradation to ESA Endangered and Candidate species, Southwestern Willow Flycatcher, Yuma Clapper Rail, Sonoran Desert Tortoise, and Roundtail Chub, to rare plant species, White Margined Penstemon, to an area acquired and/or managed for conservation purposes (McCracken Desert Tortoise ACEC), and to perennial waters (Big Sandy River) important to wildlife could occur.</p> <p><b>Note:</b> The November 2013 revision to this segment traverses the Bill Williams groundwater basin supporting the Big Sandy River. The Water Resources Development Commission in 2011 found that water demand within this basin would exceed supplies by 2035 under a low-growth scenario. Given the current status of groundwater and surface flows in the Bill Williams basin, additional development and associated groundwater pumping facilitated by a new transportation corridor would increase impacts to wildlife and habitat above baseline conditions assessed by the WRDC. Given the rarity of perennial surface water, riparian habitat, and associated wildlife, it would be difficult if not infeasible to offset impacts through mitigation measures.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
29	US93 (26 miles)	Expand	Y	X	X	X		<p>We recommend that the expansion of this segment should be avoided because direct and indirect impacts to the perennial waters and associated riparian areas that support important wildlife, including threatened and endangered species, cannot be adequately mitigated. If, however, these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation, including conducting studies to improve wildlife linkages. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p> <p><b>Comparison:</b> Segments 17 &amp; 18 have fewer impacts than 22 &amp; 29. There are options to offset impacts to habitat resources in the 17/18 area, whereas impacts to rivers and riparian areas along the segment 29 route cannot be offset.</p> <p><b>Note:</b> This segment traverses the groundwater basin supporting the Lower Hassayampa River near Wickenburg. The Water Resources Development Commission in 2011 found that water demand in the basin would exceed supplies by 2035 under a low-growth scenario. Given the current status of groundwater and surface flows in the Hassayampa basin, additional development and associated groundwater pumping facilitated by a new transportation corridor would increase impacts to wildlife and habitat above baseline conditions assessed by the WRDC. Given the rarity of perennial surface water, riparian habitat, and associated wildlife, it would be difficult if not infeasible to offset impacts through mitigation measures. Additionally, habitat loss or degradation to perennial surface waters (Hassayampa River) and riparian areas important for wildlife, notably ESA Endangered and Proposed Threatened species, Bonytail, Southwestern Willow Flycatcher, Western Yellow-billed Cuckoo, to ESA Candidate species Sonoran Desert Tortoise, to an area acquired and/or managed for conservation purposes (Hassayampa River Preserve), and to a genetically distinct and resilient population of Lowland Leopard Frog (Savage et al. 2011) could occur.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
22	Sun Valley Pkwy (30 miles)	New & Expand	Y	X	X	X		<p>We recommend that the construction of an interstate along this segment should be avoided because of the direct and indirect impacts to the resources in this area cannot adequately be mitigated. If, however, these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation, including conducting studies to improve wildlife linkages. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p> <p><b>Comparison:</b> Segments 17 &amp; 18 have fewer impacts than 22 &amp; 29. There are options to offset impacts to habitat resources in the 17/18 area, whereas impacts to rivers and riparian areas along the segment 29 route would be difficult to offset.</p> <p>Habitat loss or degradation to ESA Candidate species, Sonoran Desert Tortoise, and to native habitat, in particular xero-riparian and Sonoran Desert habitats could occur.</p> <p><b>Note:</b> We classified southern half of this segment as 'expand' because there is existing infrastructure and northern half as 'new'.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
17	Hassayampa Freeway (33 miles; 3 options, spaced 5km apart)	New	Y	X	X	X		<p>We recommend that the construction of an interstate along this segment should be avoided because of the direct and indirect impacts to the resources in this area cannot adequately be mitigated. We evaluated alternative parallel alignments 3 miles to west and 3 miles to east of this segment and found similar impacts. If, however, these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation, including conducting studies to improve wildlife linkages. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p> <p><b>Comparison:</b> Segments 17 &amp; 18 have fewer impacts than 22 &amp; 29. There are options to offset impacts to habitat resources in the 17/18 area, whereas impacts to rivers and riparian areas along segments 22 &amp; 29 route cannot be offset.</p> <p>Habitat loss or degradation to ESA Candidate species, Sonoran Desert Tortoise, to an area acquired and/or managed for conservation purposes (Vulture Mountains ACEC), and to native habitat, in particular xero-riparian and Sonoran Desert habitats could occur depending on final alignment.</p>

Proposed Segment Number	Proposed Segment Name	Proposed Change in Infrastructure	Are Resources covered by Statute, Regulation, or Policy Impacted?	Opportunities				Assessment & Recommendation Description
				Avoid Impacts	Minimize & Offset Impacts*	Study & Improve Wildlife Linkages <sup>+</sup>	Impacts Limited	
82	SR 303 Ext – Vekol Valley (13 miles)	New	Y	X	X	X		<p>We recommend that the construction of an interstate along this segment should be avoided because of the direct and indirect impacts to the resources in this area cannot adequately be mitigated. If, however, these impacts are unavoidable, measures should be taken to minimize or offset loss or degradation, including conducting studies to improve wildlife linkages. Opportunities exist to offset impacts to Sonoran Desert Tortoise habitat through existing BLM Desert Tortoise Mitigation Policy.</p> <p><b>Comparison:</b> Segments 10, 83, &amp; 19 have fewer impacts than 10, 82, 84, &amp; 15. Existing routes offer transportation connectivity with less impact to wildlife connectivity than new routes north of Sonoran Desert National Monument.</p> <p>Habitat loss or degradation to desert tortoise habitat and to native habitats, in particular riparian, xero-riparian, and Sonoran Desert habitats could occur. Additionally, the Vekol Valley is important habitat for Sonoran Desert Toads, representing the northern extent of this species' range (Sullivan et al. 1996). Similar to Segments #84 and 15 construction of an interstate along this route could contribute to isolating the northern portion of the Sonoran Desert National Monument (i.e., north of I-8). The extent of these effects and options for mitigation should be carefully studied.</p>

\* Any new construction, whether minor or major expansion of existing routes or construction of entirely new roads, could result in habitat loss or degradation to native habitat, in particular riparian, xero-riparian, Sonoran and Mojave Desert habitats. Methods to offset impacts to these native habitats should be considered for every route.

<sup>+</sup> For detailed information on Opportunities to Improve Wildlife Linkages examine data and reports available from AZ Game and Fish Department (at [http://www.azgfd.gov/w\\_c/conn\\_whatGFDdoing.shtml](http://www.azgfd.gov/w_c/conn_whatGFDdoing.shtml)), and consult with experts at AZ Game and Fish Department. Additional studies for wildlife connectivity are advised for all proposed segments, in particular for those segments where new construction is planned and in Mohave County, which has not yet completed a County-level Stakeholder Assessment.

## References:

Randall, J.M., S.S. Parker, J. Moore, B. Cohen, L. Crane, B. Christian, D. Cameron, J. MacKenzie, K. Klausmeyer, and S. Morrison. 2010. The Nature Conservancy, San Francisco, California. 106 pages + appendices. Available at: <http://conserveonline.org/workspaces/mojave/documents/mojave-desert-ecoregional-2010/@@view.html>.

Savage AE, Sredl MJ, Zamudio KR. 2011. Disease dynamics vary spatially and temporally in a North American amphibian. *Biol Conserv* 144:1910–1915.

Sullivan, B. K., R. W. Bowker, K. B. Malmos, and E. W. A. Gergus. 1996. Arizona distribution of three Sonoran Desert anurans: *Bufo retiformis*, *Gastrophryne olivacea*, and *Pteronohyla fodiens*. *Great Basin Naturalist* 56: 38-47.

Water Resources Development Commission. WRDC. 2011. Water Resources Development Commission Final Report: Volume II Committee Reports.

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 3:11 PM  
**To:** I-11ADOTstudy  
**Subject:** Comments regarding proposed I-11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Comments for proposed I-11

1. The state has only begun to incorporate wildlife crossings but none for interstates. This would be a biodiversity disaster. There are already countless dead animal carcasses littering I-10 which is a very ugly image to those traveling in Arizona.
2. The Tucson to Phoenix corridor on I-10 passes through some of the least attractive landscape in Arizona. The proposed I-11 rips up and passes through some of Arizona's most pristine and valuable habitat. Imagine the slaughter of animals, destruction to an already sensitive and dwindling desert!
3. I-10 is just fine. What it needs is to be widened to 3 and 4 lanes all the way from Tucson to Phoenix instead of the hapless 2 lanes then 3. This is ridiculous.
4. The proposal significantly cuts Tucson out of any economic benefit. Moneys should go to upgrading I-19 and I-10. It is already difficult enough for the local economy to not be cut out of a major trade and commerce corridor.

I am profoundly against this proposal.

[REDACTED]  
[REDACTED]



**From:** [REDACTED]  
**Sent:** Saturday, July 09, 2016 8:54 AM  
**To:** I-11ADOTstudy  
**Subject:** Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please do not build the I-11 thru Avra Valley. The damage to the very delicate environment in the area would be catastrophic.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 7:38 PM  
**To:** I-11ADOTstudy  
**Subject:** flood plain

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

The Gila River has a flood control dam at Painted Rock that is to protect Yuma farmers from flooding. Its spillway is at 740 elevation from sea level. In 1993 there was a major flood and water was backed up to Gillespie dam. The river was a mile wide between the bend in the river going north to the Gillespie bridge.

**From:** [REDACTED]  
**Sent:** Tuesday, July 05, 2016 2:42 PM  
**To:** I-11ADOTstudy  
**Cc:** Ed LaRue  
**Subject:** Formal Comment by the Desert Tortoise Council  
**Attachments:** I 11 final letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I am a member of the Ecosystem Advisory Committee (EAC) and the Board of the Desert Tortoise Council and I submit this comment for Ed LaRue, Chair of the EAC. A hard copy will follow in tomorrow's mail  
Thank you

--

[REDACTED]  
For the board of the Desert Tortoise Council



**DESERT TORTOISE COUNCIL**

4654 East Avenue S #257B

Palmdale, California 93552

[www.deserttortoise.org](http://www.deserttortoise.org)

5 July 2016

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

Re: Interstate 11 Corridor - Nogales to Wickenburg  
(sent by email and hard copy by [REDACTED], member of the Ecosystem Advisory Committee)

The Desert Tortoise Council (Council) is a non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of these species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council regularly provides information to individuals, organizations and regulatory agencies on matters potentially affecting the desert tortoise within its geographic range.

We appreciate the opportunity to comment on the initial study of the proposed corridor for Interstate 11 (I-11) between Nogales and Wickenburg. We understand that the proposed corridor is between 5-25 miles wide, and that this comment period is to solicit input to form potential corridor alternatives and that those will include a no action alternative.

The Council asks to be informed as an interested party of all future material released on this project including the route between Nogales and Wickenburg as well as any northern extension of the I-11.

We understand that the Arizona Game and Fish Department (AGFD) has models and observational data on the Sonoran Desert Tortoise (*Gopherus morafkai*) within the corridor area. We attached the map obtained from AGFD, although we do not have access to the data behind the model or the set of observations depicted. How does your team intend to analyze the habitats, habitat linkages and occurrences of *G. morafkai* in the course of setting alternatives for the I-11?

We notice that the corridor shown in your current study includes several important protected lands and negotiated habitat linkages. We believe that it is important that I-11 not take any desert tortoise habitat or disrupt important linkages between known populations. The recent decision not to list the Sonoran Desert Tortoise as threatened or endangered under the Endangered Species Act was based on the assumption that populations are currently stable; any take might well reverse that situation.

Please keep us fully informed as this project moves forward.

Thank you for your time,

[REDACTED]

[REDACTED]

Desert Tortoise Council, Ecosystems Advisory Committee, [REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 11:37 AM  
**To:** I-11ADOTstudy  
**Subject:** FW: I-11 Study Area (i-11adotstudy@hdrinc.com)

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

---

Dear Mr. [REDACTED],

I own land in Tonopah. I would like to suggest that the west valley boundary line of the study, since this will benefit west valley residents tremendously. Currently, there is no north/south freeway in the west valley, so this would be helpful to residents that live in the west valley and commute to the east valley. Please do whatever you can to make this happen.

Best Regards,

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 1:19 PM  
**To:** I-11ADOTstudy  
**Subject:** Fw: I-11 Study Area

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear [REDACTED]

I am a large landowner in Tonopah.

I would really recommend the west valley boundary line of the study area. This would enormously assist the west valley residents due to the absence of north south freeway further west. This would also spur growth and development in the area, since it would open up transportation to the east valley.

Thank you for your cooperation in this matter.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 10:23 AM  
**To:** I-11ADOTstudy  
**Subject:** Fw: I-11 Study scoping meeting comment TRACS #M5180

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

---

**From:** [REDACTED]  
**Sent:** Thursday, July 7, 2016 11:46 AM  
**To:** [REDACTED] AMER-US-AZ Phoenix-i11doccontrol  
**Subject:** FW: I-11 Study scoping meeting comment TRACS #M5180

---

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 1:30 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** I-11 Study

Dear [REDACTED],

It was a pleasure meeting with you in Casa Grande a few weeks ago.

Our company Vermaland has large land holdings in Tonopah, Buckeye, Gila Bend and Eloy.

I would really recommend I-11 route to be on old us 80 and close to West valley boundary line of the study area going north. This would enormously assist the west valley residents in Tonopah and Buckeye due to the absence of north south freeway further west. This would also spur growth and development in the area, since it would open up transportation to the east valley.

I also suggest a route from Eloy to go on Baumgarten Road to I-8 to Old us 80 to Wickenburg.

Our land has approximately 5 miles of frontage on Baumagarten. We'll provide the land free of charge.

Thanks.

k

[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED] [REDACTED]





[Largest Land Holdings Of 50-1200 Acre Parcels In Metro Phoenix](#)

---

Confidentiality and Nondisclosure Notice: This email transmission and any attachments are intended for use by the person(s)/entity(ies) named above and may contain confidential/privileged information. Any unauthorized use, disclosure or distribution is strictly prohibited. If you are not the intended recipient, please contact the sender by email, and delete or destroy all copies plus attachments.

**From:** [REDACTED]  
**Sent:** Friday, July 08, 2016 6:07 PM  
**To:** I-11ADOTstudy  
**Subject:** Fw: I-11 Tier 1 environmental Impact Statement

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Interstate 11 Tier 1 EIS Study Team

c/o ADOT Communications

1655 W. Jackson St. MD 126F

Phoenix, Arizona 85007

Re: Scoping Comments on the I-11 Tier 1 Environmental Impact Statement

To whom it may concern:

I strongly believe the best solution would be to ship by rail (BNSF) to existing distribution ports in Tucson or to the proposed one at Picacho Peak and then to be trucked from there.

The Santa Cruz Valley is too narrow in places and restricted by Pima County's Canoa Ranch and by Tumacacori National Park as well as by the communities of Green Valley and Sahuarita.

The west side of the Tumacacoris and the Avra Valley have already been ruled out for routes because of their important environmental value.

Thank you for giving this proposal serious consideration.

Yours truly,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 7:12 PM  
**To:** I-11ADOTstudy  
**Subject:** Fwd: I-11 Corridor Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

*Why not expand I-19, I-10 and I-8 to meet demands (if there are any). Why would we consider invading the beauty of our Saguaro Nat'l Park or polluting our Avra Valley water by even considering going thru Avra Valley--not to mention the dark night skies being illuminated (Kitt Peak). Can you imagine all those 18 Wheelers from Mexico spewing fumes as they drive thru our desert. What's more, many private farms and residences would be disturbed. We choose to live in the quiet and beauty of the valley even though we enjoy little conveniences. This pristine area has a beauty found no where else and draws many tourists to Tucson. I highly object to any part of I-11 being re-routed thru Avra Valley.*

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, July 08, 2016 11:57 AM  
**To:** I-11ADOTstudy  
**Subject:** Fwd: Interstate 11 Corridor Tier 1 Environmental Impact Statement, Nogales to Wickenburg  
**Attachments:** I-11 Freeway Scoping\_Nogales-Wickenburg\_final.pdf; Pima County Resolution.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I am resubmitting these with the attached resolution. Thanks.

----- Forwarded message -----

**From:** [REDACTED]  
**Date:** Fri, Jul 8, 2016 at 10:44 AM  
**Subject:** Interstate 11 Corridor Tier 1 Environmental Impact Statement, Nogales to Wickenburg  
**To:** [I-11ADOTStudy@hdrinc.com](mailto:I-11ADOTStudy@hdrinc.com)

Please see attached comments. Thank you.

--

[REDACTED]

[REDACTED]

Sierra Club - Grand Canyon Chapter

514 W Roosevelt St.

Phoenix, AZ 85003

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [/www.sierraclub.org/arizona](http://www.sierraclub.org/arizona)

[Facebook.](#)

--

[REDACTED]

[REDACTED]

Sierra Club - Grand Canyon Chapter

514 W Roosevelt St.

Phoenix, AZ 85003

[REDACTED]

[REDACTED]

[REDACTED]

<http://www.sierraclub.org/arizona>

[\*Facebook.\*](#)



Grand Canyon Chapter • 514 W. Roosevelt St. • Phoenix, AZ 85003  
Phone: (602) 253-8633 Email: [grand.canyon.chapter@sierraclub.org](mailto:grand.canyon.chapter@sierraclub.org)

July 8, 2016

Interstate 11 Tier 1 EIS Study Team  
c/o ADOT Communications  
1655 W. Jackson St., MD 126F  
Phoenix, AZ 85007  
Sent via email: [I-11ADOTStudy@hdrinc.com](mailto:I-11ADOTStudy@hdrinc.com)

**Re: Comments on the Interstate 11 Corridor Tier 1 Environmental Impact Statement, Nogales to Wickenburg**

Dear Interstate 11 EIS Study Team:

Thank you for the opportunity to comment on the *Interstate 11 Corridor Tier 1 Environmental Impact Statement, Nogales to Wickenburg*. Please accept these comments on behalf of the Sierra Club's Grand Canyon (Arizona) Chapter, including our more than 12,000 members in Arizona and more than 40,000 supporters.

Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Sierra Club has long been committed to protecting public lands and public health and to ensuring that transportation and development accommodate ecological considerations. Our members have a significant interest in the proposed I-11 as many live in or use areas within these corridors and will be affected by the additional air pollution, destruction of wildlife habitat, significant noise, and other negative impacts of the proposed freeway and associated corridor.

**Background**

Our country annually invests more than \$200 billion of our taxes in transportation infrastructure, including freeways, bridges, airports, public transportation, and sidewalks associated with roads. In 2014, \$279 billion was spent on transportation infrastructure, 60 percent of which was allocated to highways.<sup>1</sup> These projects have by-and-large continued to promote our nation's reliance on oil and gas, exacerbate public health and safety issues, and are a huge hit to federal, state, and local taxpayers.

The National Environmental Policy Act (NEPA) and the regulations promulgated to implement the act (42 U.S.C. § 4321, *et seq.*, 40 CFR § 1500.1, *et seq.*) mandate that the lead agency, Arizona

---

<sup>1</sup> Congressional Budget Office. 2015. Public spending on transportation and water infrastructure, 1956 to 2014. Available online at <https://www.cbo.gov/sites/default/files/114th-congress-2015-2016/reports/49910-Infrastructure.pdf>.



Department of Transportation (ADOT), assess and evaluate the environmental impacts of the I-11 Corridor and that reasonable alternatives be considered (42 U.S.C. § 4332 102 C). NEPA requires the lead agency to “[r]igorously explore and objectively evaluate all reasonable alternatives,” including those that are “not within the jurisdiction of the lead agency” (40 CFR 1502.14(a) and (c)). The Study Area for the proposed I-11 should not be arbitrarily limited, nor should the range of options, including the no-build option. ADOT must seriously consider addressing transportation issues via improving infrastructure outside the Study Area and how improved mass transit both in and outside the Study Area could improve transportation and reduce the need to construct new roadways.

ADOT, as the lead agency for this project, must consider cumulative impacts as well as direct and indirect impacts of the proposed corridor. The potential impacts of this project are large and significant. Due to the scale of this project and its potential environmental impacts, it certainly warrants an Environmental Impact Statement (EIS). As mandated by NEPA, the draft EIS should include all reasonable alternatives, an evaluation of those alternatives, and mitigation measures to minimize the disturbance and impact of the project.

In looking at proposed corridor projects and related facilities, decision-makers need to ensure the following:

- any new transportation corridor is truly needed, based on current traffic and transit projections
- the corridor minimizes local and regional environmental impacts, including to public lands
- any corridor is appropriately located to avoid or minimize harm to wildlife, wildlife habitat, and wilderness values, among other important issues.

### **Purpose and Need**

We have expressed this previously but ask again that ADOT demonstrate the need for this corridor and why it is being proposed for this particular location. Economics and congestion were the main factors considered in order to justify moving forward with this project. Although these are both important elements, many other issues should also be taken into account when justifying whether or not a project is needed and should proceed. Examples of other factors to consider include public needs and desires, environmental impacts, public health concerns, land use, and more. By only focusing on economics and congestion, the “justification” for this corridor is biased from the beginning and clearly swayed toward the need for it. If even one or a combination of the other factors were used without considering economics or congestion, the justification outcome would be quite different. In order to provide a complete picture and to truly understand whether or not this corridor is justified, all factors must be included in the analysis.

ADOT must consider appropriate growth projections relative to the proposed corridor. Frequently, numbers used to justify additional roads are misleading and quite possibly inaccurate. Merely predicting extensive growth is not enough. As evidenced by the past decade, such growth is not a certainty and projections are frequently unrealistically high<sup>2,3</sup> By ignoring the reality of the

---

<sup>2</sup> Rex, T.R. 2013. New population projections for the United States, Arizona, and Arizona counties. Arizona State University Report. Available online at <https://wpcarey.asu.edu/sites/default/files/uploads/research/competitiveness-prosperity-research/Projections.pdf>.

<sup>3</sup> U.S. Bureau of Economic Analysis. U.S. GDP growth rate by year. Available online at <http://www.multpl.com/us-gdp-growth-rate/table/by-year>. Accessed 6 July 2016.



significant downturn in the economy, the planning agencies are clearly biasing the outcome. Furthermore, ADOT should consider the fact that the corridor, especially if associated with a major freeway as has been indicated, will drive additional growth in now pristine areas and particularly will drive more urban sprawl throughout south central Arizona.

As car travel across the states has been at a steady decline, the construction of a new freeway may be unwarranted. Vehicle miles driven per capita has been flat or declining for the past decade throughout the nation.<sup>4</sup> It is likely this trend will prevail. Therefore, resources should be used to further alternative modes of transportation rather than continuing to focus on vehicle-oriented transportation.

In order to provide a fair representation and to determine if this corridor is truly needed, the planning agencies must consider all reasonable scenarios. In addition to the four included in the report, the continued economic recession, an economic depression, no-change, a slower or more moderate growth, and other scenarios must be represented and considered. It must also acknowledge the impact of the corridor on projected growth and growth patterns. Without taking such possibilities into account, the planning agencies cannot state that this corridor is justified.

### **Negative Impacts of Freeways**

The construction of freeways can introduce various negative impacts to local economies, ecology, and public health, especially for vulnerable populations. Freeways create a bypass system, whereby travelers or even locals can reach their destinations without exposure to local markets and services. Although tax dollars contribute immensely to the building and long-term maintenance of freeways, this infrastructure presence does not pay back these funds and even potentially decreases cities' revenues as well the property values of taxpayers living near the freeway.<sup>5</sup> Such effects must be evaluated in the NEPA analysis for this corridor.

Interstates and freeways continue America's forced addiction to vehicles, in which people must have access to an automobile in order to commute or travel. This disproportionately affects low-income residents and is a huge burden to taxpayers. In addition, these roads frequently cut through low-income and predominantly minority neighbors, resulting in fragmentation of neighborhoods and displacement of people who do not have good housing alternatives.<sup>6</sup>

Local ecology suffers enormously. In fact, roads are a chief threat to both local and global biodiversity.<sup>7,8</sup> Regarding wildlife, the leading cause of death for many animals and for reductions in local wildlife populations can be attributed to road mortality. More than one million vertebrates die on roads every day in the United States,<sup>9</sup> but this number may be a significant underestimate of true

---

<sup>4</sup> Mayors Innovation Project. 2013. Rethinking the urban freeway. Available online at [http://www.ssti.us/wp/wp-content/uploads/2013/12/SURDNA\\_freeway-brief.pdf](http://www.ssti.us/wp/wp-content/uploads/2013/12/SURDNA_freeway-brief.pdf).

<sup>5</sup> Mayors Innovation Project 2013

<sup>6</sup> Dreier, P., J.H. Molenkopf, and T. Swanstrom. 2004. Place matters: metropolitics for the twenty-first century. University Press of Kansas.

<sup>7</sup> Jackson, N.D., and L. Fahrig. 2011. Relative effects of road mortality and decreased connectivity on population genetic diversity. *Biological Conservation* 144:3143–3148.

<sup>8</sup> Laurence, W.F., and A. Balmford. 2013. Land use: a global map for road building. *Nature* 495:308–309.

<sup>9</sup> Environmental Science. 2016. The environmental impact of roads. Available online at <http://www.environmentalscience.org/roads>.

mortality rates<sup>10</sup> and also does not account for impacts on invertebrate species. Effects extend far beyond just direct mortality and the immediate roadway, however.<sup>11</sup> The presence of a freeway fragments and alters species' habitats, which is the leading cause of species' declines and sensitivity.<sup>12,13</sup> Chemical, light, and noise pollution associated with freeways act as a detriment to various species' breeding and migration patterns and can negatively affect normal behaviors.<sup>14,15</sup> Lands cleared for roads can also foster invasive species, which substantially alter ecosystem composition and processes.<sup>16</sup> In short, the cumulative impacts of roads on the natural system are enormous and overwhelming.<sup>17,18</sup> These are not trivial impacts, yet they are often overlooked or brushed aside in transportation planning.

Further, the implementation of road infrastructure threatens public health in multiple regards. Vehicle injuries are one of the leading causes of death in the world.<sup>19</sup> Both motorists and non-motorists are affected. Freeways and interstates pose a risk to pedestrians and bicyclists, as these non-automobile users are exposed to hard-to-navigate areas near on and off ramps where vehicles are traveling at higher speeds in areas with restricted visibility.<sup>20</sup> As with wildlife, effects are not limited to just direct mortality. Increased vehicle emissions from freeways can exacerbate numerous health conditions, including asthma, and can increase ground-level ozone production.<sup>21,22</sup> Additionally, freeways contribute to elevated temperatures through the urban heat island effect, an issue with which many communities in Arizona struggle.<sup>23,24</sup>

### **Environmental Impacts that Should be Considered in NEPA Process**

The draft EIS should evaluate the impacts of the proposed corridor and associated infrastructure to protected lands; wildlife, habitat, and wildlife-movement corridors; native vegetation and vegetation communities; endangered and special-status species (animals and plants); riparian areas and desert washes; air quality, including to all Class I airsheds, nonattainment areas, and attainment areas that may be driven closer to nonattainment with the increased traffic associated with a freeway; and implications relative to climate change, among others. An in-depth analysis specific to this project of

---

<sup>10</sup> Zimmerman Teixeira, F., A.V. Pfeifer Coelho, I. Beraldi Esperandio, and A. Kindel. 2013. Vertebrate road mortality estimates: effects of sampling methods and carcass removal. *Biological Conservation* 157:317–323.

<sup>11</sup> Holderegger, R., and M. Di Giulio. 2010. The genetic effects of roads: a review of empirical evidence. *Basic and Applied Ecology* 11(6):522–531.

<sup>12</sup> Environmental Science 2016

<sup>13</sup> Jackson and Fahrig 2011.

<sup>14</sup> Environmental Science 2016

<sup>15</sup> Summers, P.D., G.M. Cunningham, and L. Fahrig. 2011. Are the negative effects of roads on breeding birds caused by traffic noise? *Journal of Applied Ecology* 48:1527–1534.

<sup>16</sup> Christen, D.C., and G.R. Matlack. 2009. The habitat and conduit functions of roads in the spread of three invasive plant species. *Biological Invasions* 11(2):453–465.

<sup>17</sup> Balkenhol, N., and L.P. Waits. 2009. Molecular road ecology: exploring the potential of genetics for investigating transportation impacts on wildlife. *Molecular Ecology* 18(20):4151–4164.

<sup>18</sup> Trombulak, S.C., and C.A. Frissell. 2000. Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology* 14(1):18–30.

<sup>19</sup> World Health Organization. 2016. Road traffic injuries. Available online at <http://www.who.int/mediacentre/factsheets/fs358/en>.

<sup>20</sup> Mayors Innovation Project 2013

<sup>21</sup> Frumkin, H., L. Frank, R. Jackson. 2004. *Urban sprawl and public health: designing, planning, and building for healthy communities*. Island Press.

<sup>22</sup> Van Vliet, P., M. Knape, J. de Hartog, N. Janssen, H. Harssema, and B. Brunekreef. 1997. Motor vehicle exhaust and chronic respiratory symptoms in children living near freeways. *Environmental Research* 74(2):122–132.

<sup>23</sup> Hart, M.A., and D.J. Sailor. 2009. Quantifying the influence of land-use and surface characteristics on spatial variability in the urban heat island. *Theoretical and Applied Climatology* 95(3):397–406.

<sup>24</sup> Mayors Innovation Project 2013

any potential effects should be conducted and provided in the draft EIS. These impacts should be evaluated across the life of the project, including during surveying, construction, and implementation and maintenance.

Every attempt should be made to avoid sensitive lands, riparian areas, important wildlife habitat and movement corridors, special status plants, and archaeological sites. Potential effects include, but are not limited to, soil disturbance and eradication of plant communities; soil erosion; disturbance of ground-dwelling species including amphibians, reptiles, mammals, and ground-nesting birds; interference with species that prefer locations distant from roads; effects on species that do not cross open areas; interference with birds and bats, whether migrating or not; and potential for pollution or diversion of waterways.

Limiting and eliminating negative impacts to wildlife, vegetation, riparian areas, and cultural sites should be a top priority for ADOT. Significant efforts have been made within the proposed corridor to maintain large natural open spaces, to protect sensitive and common species, to provide wildlife movement corridors, to eradicate invasive species, and much more. Diverse groups from across the spectrum have collaborated on these efforts. The proposed I-11 corridor is highly likely to reverse those efforts and to negate decades of work among collaborative stakeholders. ADOT should work closely with other agencies and groups, such as the Arizona Game and Fish Department and Coalition for Sonoran Desert Protection, to determine the validity and need for this project, to identify potential problems, to implement appropriate avoidance and mitigation measures, and to ensure adequate monitoring.

Monitoring any anticipated impacts of the proposed project on wildlife species and natural resources will be essential for identifying ways to minimize and offset negative impacts. The draft EIS should disclose how environmental monitoring and mitigation will be undertaken, including the type, timing, and frequency of surveys, protocols and thresholds to initiate impact minimization, and methods to be employed to offset unavoidable impacts, increased vehicular traffic, accelerated erosion/sedimentation, human disturbance, impairment of visual resources, etc.

The draft EIS should evaluate whether the current economic structure of the region is even sustainable and whether the proposed corridor could exacerbate some of the problems associated with developing a more sustainable economy. In light of long-term drought, dwindling Colorado River water supplies, more extreme heat, more extreme fires, and the various implications of climate change, assuming that business-as-usual can continue and that a new major interstate will help the economy is a great leap.

### **Analyze a Rail Only Alternative**

The Grand Canyon Chapter of Sierra Club has long supported a passenger rail line connecting Tucson to Phoenix with stations at key points in between. Such a line could be expanded to other communities within the proposed I-11 corridor in order to meet the needs of the proposed interstate. A high-capacity passenger rail line is essential for relieving congestion on highways and getting people to their destinations. Such a rail system can also help protect public health, benefit our economy, and reduce negative environmental effects by decreasing transportation-related pollution and energy use and by reducing the need to build additional roadways and other infrastructure.

ADOT is currently considering a rail line between Phoenix and Tucson. Unfortunately, the routes under consideration track through currently undeveloped lands, which would not meet the presumed needs that I-11 is meant to address. By locating a rail line in an already-developed area, such as

along the I-10 corridor, which is already fragmented by the freeway, the needs of I-11 could be met while providing opportunities for safer and more efficient travel. A thorough EIS and evaluation of alternatives is needed to determine the full impacts, however. I-10 is the most commonly traveled route between Tucson and Phoenix and is used by travelers from most of the Phoenix area, including in the East Valley. Similarly, this route would provide a more direct connection between the Phoenix and Tucson population centers. Following the route that is most commonly traveled could promote ridership as the rail would act as both an introduction and a reminder to users of I-10 that alternative transportation options are available. It also provides more of what is needed to make this successful – mass transit on each end of the line. There is still work to do in these communities, but Tucson and Phoenix have the most developed transit. By placing the rail line through more remote areas, including areas that are not as heavily traveled or through a new corridor, ridership may not be as high.

By concentrating in areas that are already disturbed, such as along existing freeways or rail lines, damage to environmental resources could be greatly diminished and less infrastructure may be needed, as well. As noted above, by aligning the rail in areas that are already developed, the maximum number of people will be able to utilize the rail, increasing its effectiveness. At least three of ADOT's own studies have found passenger rail from Phoenix through Tucson to Nogales in existing rail corridors to be viable. Passenger rail enjoys healthy success in California, Utah, and the Pacific Northwest, and there is no reason to believe it would not succeed in Arizona. In these times of global climate change, rail must be our transportation future; the sooner we begin developing it, the better.

The draft EIS should study the visual impacts a major freeway would have throughout the state, as well as the resulting air quality impacts. Particular attention should be given to class 1 areas in the state, such as national parks, national monuments, and national wilderness areas, as these zones are granted special air quality protections under Section 162(a) of the federal Clean Air Act.<sup>25</sup>

### **Analyze Impacts on Urban Sprawl**

We are also concerned that the proposed corridor would result in or even be used to promote more development in currently undeveloped lands. Although some believe this area will be built up in the next several decades, such development is not certain, and ADOT should not seek to facilitate it with infrastructure development. Routing the corridor in certain areas would itself cause irreparable damage to environmental resources; the subsequent growth spurred in these areas would further facilitate environmental destruction and degradation. Any time a new road or rail line is constructed in undisturbed areas, it causes direct wildlife mortality, fragments wildlife habitat, causes or exacerbates air and water pollution, and much more.

As stated in our previous comments, ADOT must thoroughly analyze impacts to environmental resources, including public and sensitive lands, water resources, wildlife, cultural areas, and more. This analysis should be specific to this project and should focus on direct and indirect effects. We encourage ADOT to work with cooperating agencies to gain a full understanding of how these resources would be affected by the different alignments and what mitigation options would be most effective.

---

<sup>25</sup> [https://www3.epa.gov/region9/air/maps/az\\_clss1.html](https://www3.epa.gov/region9/air/maps/az_clss1.html)

## **Impacts to Specific Areas**

The discussion below addresses some of the areas that could be affected by this proposal. This is by no means a complete list. ADOT must thoroughly analyze potential impacts to these areas as well as other sensitive lands and resources. We encourage ADOT to work with local conservation organizations to identify potentially-affected lands and resources as well as possible mitigation efforts.

### ***Maricopa County***

Maricopa County includes several regional parks, national monuments, and other public lands, wilderness areas, and protected lands that could be affected by this proposed corridor. Special consideration should be given to the Hassayampa River and other riparian and flood-prone areas relative to environmental impacts, as well as public safety. The Juan Bautista de Anza National Historic Trail runs through portions of Maricopa County and could be affected by this proposed corridor. Special consideration and avoidance of parks and wildlands should be given and impacts thoroughly evaluated, including to Buckeye Hills, White Tanks, and Estrella Mountain regional parks; Sonoran Desert National Monument; Sierra Estrella Wilderness; North and South Maricopa Wilderness, and others. A specific and in-depth study should be conducted regarding the sprawl effects on Rainbow Valley if I-11 were to be built through it. The Vulture Mountains area is an important wildland area that should also be considered and protected from the impacts of development. The draft EIS should study the visual impacts of a major freeway and associated infrastructure to air quality in these areas, especially to all Class 1 airsheds.

### ***Pima County***

Pima County is home to the landmark Sonoran Desert Conservation Plan, which directs growth to appropriate areas and preserves our rich habitat and wildlife movement corridors that 44 identified vulnerable species, some of them endangered, need for survival. New high-speed, divided, multi-lane superhighways are not compatible with the plan, would threaten the viability of these unique species, and are inconsistent with the county's Section 10 permit and approved Multi-Species Habitat Conservation Plan with U.S. Fish and Wildlife Service. In 2007, when an Interstate 10 "bypass" quite similar to the I-11 concept was under study, the county's elected Board of Supervisors passed Resolution 2007-343 in strident opposition to any such roadway. A copy of that resolution is attached. This well-reasoned resolution calls for ADOT to reject any such new controlled-access highways in favor of expanding travel capacity in the existing I-10 and Union Pacific corridors and particularly to consider rail alternatives instead of additional car and truck capacity.

Among the most sensitive areas in Pima County are Saguaro National Park and the adjacent Tucson Mountain Park. These areas are squarely within the study area, just west of downtown Tucson. A route through the Avra Valley west of the Tucson Mountains would irreparably isolate this unit of the national park from other important habitat areas. Furthermore, when the Central Arizona Project canal was built through the Avra Valley, a Wildlife Mitigation Corridor was purchased and set aside so that wildlife linkages would be maintained. This corridor links the Garcia Strip of the Tohono O'odham Nation to Tucson Mountain Park and Saguaro National Park. The draft EIS analysis should include effects of all routes on viewsheds, dark night skies, natural soundscapes, wilderness values within the park, air quality and nitrogen deposition. There is no room for a freeway to be routed between these protected land designations. Maintaining these linkages for wildlife and scenic values is critically important for protecting the national park.

### ***Pinal County***

Pinal County has a variety of state parks, wilderness areas, and national monuments that could be affected by this proposed I-11 corridor. The draft EIS should thoroughly analyze impacts to these areas, and alternatives should be included that avoid impacts to Ironwood Forest National Monument, Sonoran Desert National Monument, Picacho Peak, and other protected areas.

### ***Santa Cruz County***

The Tumacacori National Historical Park, historic Tubac, and the Juan Bautista de Anza National Historic Trail could be affected in Santa Cruz County. Special care should be taken to avoid these areas, and any impacts should be evaluated in the draft EIS.

### ***Tribal Lands***

The draft EIS must evaluate impacts to tribal lands, traditional tribal lands, and cultural resources. Per NEPA, the National Historic Preservation Act, and other laws and rules, ADOT must consult with specific tribes that have connections to these lands, including, but not limited to, the Gila River Indian Community, the Ak Chin Indian Community, the Tohono O'odham Nation, and the Pascua Yaqui Tribe.

### **Impacts to specific at-risk species**

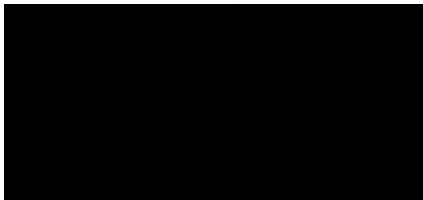
The draft EIS should fully analyze the impacts to all native plant and animal species present in the project area, and especially those classified as federally “endangered” or “threatened,” by the state of Arizona as a “species of concern,” and by Pima County as “vulnerable” under the Sonoran Desert Conservation Plan. Species to be considered should include, but should not be limited, to the following:

Chiricahua leopard frog  
western yellow-billed cuckoo  
Southwest willow flycatcher  
Arizona shrew  
Swainson's hawk  
rufous-winged sparrow  
Mexican spotted owl  
giant spotted whiptail  
Yuma clapper rail  
Pima pineapple cactus  
Nichol turk's head cactus  
Arizona hedgehog cactus  
Huachuca water umbel  
western red bat  
Mexican long-tailed bat  
pale Townsend's big-eared bat  
lesser long-nosed bat  
desert pupfish  
Gila chub  
Apache trout  
Gila topminnow  
razorback sucker  
Sonoran pronghorn  
Sonoran desert tortoise

**Summary**

Thank you again for the opportunity to provide scoping comments on this proposal. ADOT must seriously consider whether this project is necessary and appropriate or whether it is being pushed forward based on outdated and inaccurate data and needs. Negative impacts to our state's diverse natural resources are unavoidable with a project of this magnitude, and mitigation efforts will not be able to adequately offset the direct, indirect, and cumulative effects. We expect a thorough analysis of the impacts and a hard look at the full range of reasonable alternatives, including those that do not envision a freeway and its associated infrastructure.

Sincerely,

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering the name of the sender.

Sierra Club – Grand Canyon Chapter

**RESOLUTION NO. 2007- 343**

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

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

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

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and



WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

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

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

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

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

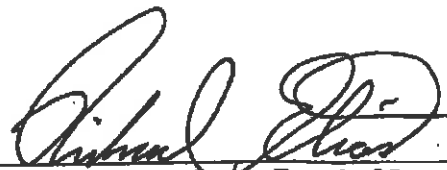
WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity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

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

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.

2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.



Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:



Clerk of the Board



Deputy County Attorney

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 12:32 PM  
**To:** I-11ADOTstudy  
**Subject:** I oppose I-11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern:

Not long ago two bighorn sheep were spotted in the Tucson Mountains. Biologists traced thier tracks west across a break in the CAP canal that was designed and built for wildlife passage. Now a proposed freeway, I-11, could keep them from returning—and threatens far more.

The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West.

Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.

I'm also concerned about impacts to federally and locally protected open space, including Ironwood Forest National Monument, Saguaro National Park, the Bureau of Reclamation's Central Arizona Project mitigation corridor, City of Tucson mitigation lands for their Avra Valley Habitat Conservation Plan, and Pima County mitigation lands for their Multi-Species Habitat Conservation Plan.

There is no need for a new freeway. I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. I'm in agreement with the 2007 Pima County Board of Supervisors Resolution opposing *"the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated."*

Under the right circumstances, I could support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.

Thank you for your kind consideration,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 11:48 AM  
**To:** I-11ADOTstudy  
**Subject:** I oppose I-11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern:

Not long ago two bighorn sheep were spotted in the Tucson Mountains. Biologists traced thier tracks west across a break in the CAP canal that was designed and built for wildlife passage. Now a proposed freeway, I-11, could keep them from returning—and threatens far more.

The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West.

Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.

I'm also concerned about impacts to federally and locally protected open space, including Ironwood Forest National Monument, Saguaro National Park, the Bureau of Reclamation's Central Arizona Project mitigation corridor, City of Tucson mitigation lands for their Avra Valley Habitat Conservation Plan, and Pima County mitigation lands for their Multi-Species Habitat Conservation Plan.

There is no need for a new freeway. I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. I'm in agreement with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated."

Under the right circumstances, I could support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.

Thank you for your kind consideration,

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 4:41 PM  
**To:** I-11ADOTstudy  
**Subject:** I oppose I-11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern:

Not long ago two bighorn sheep were spotted in the Tucson Mountains. Biologists traced their tracks west across a break in the CAP canal that was designed and built for wildlife passage.

Now a proposed freeway, I-11, could keep them from returning—and threatens far more.

The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West.

Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.

I'm also concerned about impacts to federally and locally protected open space, including Ironwood Forest National Monument, Saguaro National Park, the Bureau of Reclamation's Central Arizona Project mitigation corridor, City of Tucson mitigation lands for their Avra Valley Habitat Conservation Plan, and Pima County mitigation lands for their Multi-Species Habitat Conservation Plan.

There is no need for a new freeway. I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. I'm in agreement with the 2007 Pima County Board of Supervisors Resolution opposing *"the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated."*

Under the right circumstances, I could support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.

Thank you for your kind consideration,

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Tuesday, June 28, 2016 9:53 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11: Pima County Board of Supervisors Resolution 2007-343

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

**RESOLUTION NO. 2007- 343**

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

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

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

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and



WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

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

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

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

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

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

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

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.

2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.



Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:



Clerk of the Board



Deputy County Attorney

**From:** [REDACTED]  
**Sent:** Wednesday, June 29, 2016 4:59 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Comment

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West.

Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
[REDACTED]  
**Sent:** Thursday, July 07, 2016 12:34 PM  
**To:** I-11ADOTstudy  
**Cc:** Coalition for Sonoran Desert Protection  
**Subject:** I-11 Comments and Concerns  
**Attachments:** CSDP-I-11-Scoping-Comments-070716-FINAL-with-attachment.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern,

I am opposed to the I-11 corridor. Around the world transportation professionals have realized the folly of projects like this, and it is time that ADOT and others rethink transportation, because earth and climate change matter.

I'm a long time member of the Coalition for Sonoran Desert Protection and have attached the scoping comment letter from this important organization.

I'm also a grandmother who has seen the "endless production of more" mentality and it's consequences. Won't you consider how we can plan for access while taking care of the world our grandchildren and future generations will inherit?

Thank you for the opportunity to comment.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] *supplies desert foods and inspiration to the community, integrating conservation, sun power, water harvesting, permaculture and eco-logical design. We partner with schools and organizations to provide engaging, hands-on experiences for students, volunteers and participants.*



## Coalition for Sonoran Desert Protection

300 E. University Blvd., Suite 120  
Tucson, Arizona 85705  
p (520) 388-9925 • f (520) 791-7709  
[www.sonorandesert.org](http://www.sonorandesert.org)

July 7, 2016

Arizona Center for Law  
in the Public Interest  
Arizona Native Plant Society  
Bat Conservation  
International  
Cascabel Conservation  
Association  
Center for Biological  
Diversity  
Center for Environmental  
Connections  
Center for Environmental  
Ethics  
Defenders of Wildlife  
Desert Watch  
Empire Fagan Coalition  
Environmental and Cultural  
Conservation Organization  
Environmental Law Society  
Friends of Cabeza Prieta  
Friends of Ironwood Forest  
Friends of Madera Canyon  
Friends of Saguaro National  
Park  
Friends of Tortolita  
Gates Pass Area  
Neighborhood Association  
Genius Loci Foundation  
Native Seeds / SEARCH  
Northwest Neighborhood  
Alliance  
Protect Land and  
Neighborhoods  
Safford Peak Watershed  
Education Team  
Save the Scenic Santa Ritas  
Sierra Club – Grand Canyon  
Chapter  
Sierra Club – Rincon Group  
Sky Island Alliance  
Sky Island Watch  
Society for Ecological  
Restoration  
Sonoran Permaculture  
Guild  
Southwestern Biological  
Institute  
Tortolita Homeowners  
Association  
Tucson Audubon Society  
Tucson Herpetological  
Society  
Tucson Mountains  
Association  
Wildlands Network  
Women for Sustainable  
Technology

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

### **RE: Scoping Comments on the Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg**

To Whom It May Concern:

The Coalition for Sonoran Desert Protection appreciates the opportunity to provide scoping comments for the *Interstate 11 Tier 1 Environmental Impact Statement (EIS), Nogales to Wickenburg*.

We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection, founded in 1998 and comprised of 34 environmental and community groups working in Pima County, Arizona. Our mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan. We achieve this mission by advocating for: 1) the protection and conservation of Pima County's most biologically rich areas, 2) directing development to appropriate land, and 3) requiring appropriate mitigation for impacts to habitat and wildlife species.

In summary, our scoping comments highlight the need for further evaluation of the purpose and need for this project and major environmental impacts that should be considered in Pima County as this study area is evaluated. These potential environmental impacts include impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation's Central Arizona Project Mitigation Corridor; local conservation lands such as Tucson Mountain Park, planned mitigation lands for Habitat Conservation Plans under development by the City of Tucson, Pima County, and Town of Marana, and Pima County's Conservation Lands System; critical wildlife linkages and connectivity between large wildland blocks such as are described in Arizona's Wildlife Linkages Assessment, the Coyote-Ironwood-Tucson Wildlife Linkage, the Ironwood-Picacho Wildlife Linkage, and the 2012 Pima County Wildlife Connectivity Assessment conducted by the Arizona Game and Fish Department (AzGFD); and increasingly rare riparian habitat.

## **Purpose and Need**

First and foremost, we strongly believe that ADOT should clearly and thoroughly demonstrate the need for this corridor based on the best available science and data. This includes the most current transportation and growth models for this region, current and projected traffic volumes, and established plans to continue widening Interstate 10. Other factors that need to be evaluated include how continued climate change will impact Arizona's water resources and project population growth; public health implications; environmental impacts; and long-term impacts on land-use.

## **Major Environmental Impacts for Evaluation**

### ***Impacts to Federal and Local Protected Areas***

The EIS should fully outline the impacts to all federal and local protected areas and the biological resources they contain. In particular, the study area for the EIS encompasses Avra Valley west of the Tucson Mountains in Pima County. Any alignments considered in Avra Valley would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and planned mitigation lands for Habitat Conservation Plans (HCPs) under development by the City of Tucson, Pima County, and the Town of Marana (the Pima County Multi-Species HCP has been officially approved by the U.S. Fish and Wildlife Service and the 30-year Incidental Take Permit will be voted on by the Pima County Board of Supervisors in September 2016; Tucson's Avra Valley HCP was submitted in November 2014 and is currently under review by the U.S. Fish and Wildlife Service; the Marana HCP is currently on hold).

In addition, the study area encompasses smaller, yet still vitally important, local protected areas such as Tortolita Mountain Park, the Hardy Wash system and Arthur Pack Regional Park, and others. All of these protected lands are public investments in conservation. Reduced ecological values due to the effects of fragmentation by any proposed infrastructure developments, including highways, should be avoided to the greatest extent practicable; any unavoidable impacts should be minimized; and all impacts should be mitigated for to the fullest extent where avoidance and minimization are deemed impossible.

### ***Impacts to Wildlife Linkages***

The EIS should fully outline the impacts to all of the identified wildlife linkages in the study area. In Pima County, an Interstate 11 alignment through Avra Valley would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally-recognized regional conservation plan developed and implemented over the last 18 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded by the Arizona Department of Transportation and AzGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. And most recently, AzGFD's

2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. Any Interstate 11 alternatives that are located in Avra Valley would also sever the Ironwood-Picacho wildlife linkage.

The study area also encompasses a highly threatened wildlife linkage between the Tucson and Tortolita Mountains and skirts the edge of another highly threatened wildlife linkage between the Tortolita and Santa Catalina Mountains. Both of these wildlife linkages have been the focus of substantial public investment in recent years by the state of Arizona, Pima County, and other local jurisdictions. In March 2016, the Sonoran Desert's first wildlife bridge, funded by Pima County's Regional Transportation Authority, was completed in the Santa Catalina-Tortolita Mountains wildlife linkage. Smaller wildlife underpasses are planned for Tangerine Road and Silverbell Road within the Tucson-Tortolita Mountains wildlife linkage. Impacts to these wildlife linkages in particular should be fully considered in the EIS.

Lastly, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature such as a new highway, severing an important movement area for wildlife, cannot be adequately mitigated off-site.

#### ***Impacts to Pima County's Conservation Lands System***

The EIS should fully outline impacts to Pima County's Conservation Lands System. All possible alignments of Interstate 11 would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the U.S. Fish & Wildlife Service, Arizona Game & Fish Department, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically-based map and set of policy guidelines for Pima County's most biologically-rich lands. These lands include Important Riparian Areas, Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request rezoning or other discretionary actions from the County.

The CLS is a cornerstone of the Sonoran Desert Conservation Plan and has guided many conservation decisions in Pima County since its adoption. Impacts to Pima County's Sonoran Desert Conservation Plan and the CLS should be considered for all potential corridor alignments. All impacts to CLS acreage need to be fully mitigated as close to the area of impact as possible, with habitat as good, or better, than that impacted.

### ***Impacts to Riparian Habitat***

The EIS should fully outline impacts to riparian habitat within the study area. Any possible Interstate 11 alignments through unincorporated Pima County would undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

“Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state.”<sup>1</sup>

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of the floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS’s Important Riparian Areas and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

### ***Impacts to at-risk species***

The EIS should fully outline the impacts to all species present in the project area, and especially those classified as federally “endangered” or “threatened,” by the state of Arizona as a “species of concern,” and by Pima County as “vulnerable” under the SDCP. Some of these species include:

Sonoran Desert tortoise  
Chiricahua leopard frog  
Western yellow-billed cuckoo

---

<sup>1</sup> [http://www.azgfd.gov/pdfs/w\\_c/partners\\_flight/APIF%20Conservation%20Plan.1999.Final.pdf](http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf)



Southwest willow flycatcher  
Mexican spotted owl  
Cactus ferruginous pygmy-owl  
Burrowing owl  
Yuma clapper rail  
Tucson shovel-nosed snake  
Nichol turk's head cactus  
Arizona hedgehog cactus  
Pima pineapple cactus  
Huachuca water umbel  
Lesser long-nosed bat  
Desert pupfish  
Gila chub  
Apache trout  
Gila topminnow  
Razorback sucker

***Broader Impacts***

Finally, the EIS should fully consider the broader impacts of all alternative alignments. Any Interstate 11 alignments through Avra Valley would dramatically increase accessibility and thus encourage commercial and residential development. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs, and force major changes to existing land-use and zoning designations. Existing land use plans have identified the areas most appropriate for growth and any new transportation corridors should be appropriately sited within those existing growth areas. **In consideration of the proposed Interstate 11 between Nogales and Wickenburg, we argue that improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best minimize environmental impacts. The Coalition questions the need for a new interstate between Nogales and Wickenburg at all.**

***2007 Pima County Resolution***

In 2007, the Pima County Board of Supervisors passed Resolution No. 2007-343 opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." Additionally, the Board called for the expansion of "capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor." We strongly concur with Pima County's 2007 resolution. Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.

***Pima County Draft Alignment***

Lastly, on July 2, 2013 Pima County's Administrator released a report entitled *Transportation Planning Activities in the Area West of the Tucson Mountains Linkage with Interstates 19 and 10 through the Aerospace and Defense Corridor*. This report included a "Draft Pima County Interstate 11 Alignment" that runs through Avra Valley west of the Tucson Mountains. We continue to strongly oppose this alignment and any iteration of an alignment that bisects Avra Valley. Ninety-four percent (94%) of the Draft Pima County Interstate 11 Alignment impacts land in one or more categories of the CLS. According to the County's own calculation, these impacts would require nearly 5,000 acres of mitigation. All of our comments above related to wildlife linkages, riparian habitat, sensitive wildlife species, and especially broader impacts related to infrastructure costs and long-term land-use changes, apply to the Draft Pima County Interstate 11 Alignment. The location of this alignment lies within the study area for the *Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg*.

Thank you for the opportunity to provide scoping comments on the *Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg*. We look forward to your assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.

Sincerely,

[Redacted Signature]  
[Redacted Name]  
[Redacted Title]

**RESOLUTION NO. 2007- 343**

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

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

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

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and

WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

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

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

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

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

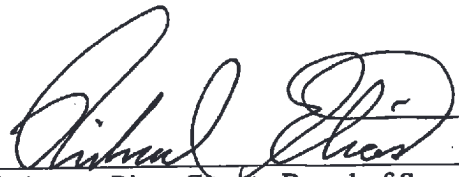
WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity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

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

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.

2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.



Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:



Clerk of the Board



Deputy County Attorney

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 2:33 PM  
**To:** I-11ADOTstudy  
**Cc:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** I-11 Corridor Study Comments  
**Attachments:** I-11 Tier1 comment.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please find comments from the Arizona professional astronomy and space sciences community attached.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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

July 7, 2016



[info@apss-az.org](mailto:info@apss-az.org)

Dear Study Team Members,

As you consider various constraints on I-11 development and implementation, we urge you to consider the impact of artificial lighting. Our group, APSS, is an association of professional astronomical observatories and space sciences programs within the State of Arizona. Southern Arizona has a unique concentration of major optical observatories, supported by Federal, State, and other research consortium funding. The initial investment in observatories was in all cases made on the basis of extraordinarily good observing conditions, including the dark desert skies. Continuing and considerable investment in these facilities has been made based on expectations that the sites would continue to be reasonably protected by sensible design of roadway, signage, and other outdoor lighting to minimize the impact of artificial sky glow. Our goal is to work with any new developments to reduce as much as possible the glare added to the dark night sky by outdoor lighting. Although any development adds to that artificial background, we believe that rigorous and enforceable standards can allow for safety and vigorous commercial activity while keeping uplighting to a practical minimum.

The current routing of I-19 comes within seven miles of the Fred Lawrence Whipple Observatory (FLWO) located on Mt. Hopkins. The Observatory is the site of 20 telescopes, with the largest being the 6.5-m MMT, the 14th largest telescope in the world, operated jointly by the University of Arizona and the Smithsonian Institution. Lighting from the Tucson metro area impacts all the professional observatories in Southern Arizona, including Kitt Peak National Observatory on the Tohono O'odham Reservation and Mt. Lemmon, within the Coronado National Forest.

Currently, local codes protect the near zones around these observatories on Mt. Hopkins and Mt. Lemmon by restricting the total amount of light permitted and requiring fully shielded fixtures allowing no light above horizontal. We urge that design requirements should at minimum adhere to the existing local codes.

We note that ADOT has exerted special care in the replacement and upgrade of highway lighting in Southern Arizona, for which the astronomy community is appreciative.

Community expectation is that state-of-the-art roadway lighting design and implementation will be employed, including deployment of light fixtures only at major interchanges, minimum

*Lowell Observatory*

*University of Arizona  
Steward Observatory*

*University of Arizona  
Planetary Sciences Department*

*Kitt Peak National Observatory*

*Fred Lawrence Whipple Observatory*

*Vatican Observatory*

illumination required to meet safety standards, and motion-activated systems for low traffic late night hours. Additional care should be taken in the choice of spectral output for highway lights, with all blue light blocked, low correlated color temperature, and employment of narrow-band amber at closest approach to high mountain observatories.

We appreciate your consideration, and are available to meet with you and participate in any future stage of the planning and implementation process.

With best regards,

[REDACTED]  
Dark Sky Partners, LLC

[REDACTED]  
University of Arizona

[REDACTED]  
MMT Observatory

[REDACTED]  
Steward Observatory

[REDACTED]  
FLWO

[REDACTED]  
Kitt Peak National Observatory

[REDACTED]  
Vatican Observatory

[REDACTED]  
Lowell Observatory

[REDACTED]  
University of Arizona

[REDACTED]  
FLWO

[REDACTED]  
National Optical Astronomy Obs.

[REDACTED]  
University of Arizona

[REDACTED]  
Vatican City State

[REDACTED]  
National Optical Astronomy Obs.

[REDACTED]

*Lowell Observatory*

*University of Arizona  
Steward Observatory*

*University of Arizona  
Planetary Sciences Department*

*Kitt Peak National Observatory*

*Fred Lawrence Whipple Observatory*

*Vatican Observatory*



**From:** [REDACTED]  
**Sent:** Friday, June 24, 2016 9:39 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Corridor Study

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I attended the I-11 Public Scoping Meeting held June 23 at the Marana Middle School, and have the following comments and input.

The meeting focused on identifying 2,000-foot wide corridors that would form the basis for future selections of route alternatives. One component not addressed was connections from the I-11 corridors back to I-10, using exiting or new roadways.

1. Identify any new connections between I-11 and I-10, along with traffic projections and impacts.
2. Identify the existing roadways that would be used, along with the traffic projections and impacts.
3. Identify expected infrastructure connections from new infrastructure facilities included as part of the I-11 project to existing infrastructure facilities; and their impacts.

Submitted by,

[REDACTED]  
[REDACTED]  
[REDACTED]  
  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, May 26, 2016 10:31 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Corridor Study

**Follow Up Flag:** Follow up  
**Flag Status:** Completed  
**Expires:** Tuesday, November 22, 2016 12:00 AM

Please add me to your mailing list for public information regarding this project.

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 3:40 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Corridor Study

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern;

As a broker in the Tonopah area, I would suggest that the West Valley boundary of the study would create a huge advantage for the residents in the area as well as to promote the future growth of the west valley. There are no other north/south routes until you reach the far west portion of Arizona

*Best Regards,*

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, July 08, 2016 3:35 PM  
**To:** I-11ADOTstudy  
**Cc:** [REDACTED]  
**Subject:** I-11 Corridor Tier 1 EIS Comments  
**Attachments:** SIA I-11 Tier 1 Scoping Comments 7.8.2016.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Interstate 11 EIS Study Team,

On behalf of Sky Island Alliance, thank you for the opportunity to submit the following comments in response to the ADOT's Interstate 11 Corridor Tier 1 Environmental Impact Statement, Nogales to Wickenburg.

Our comments are attached.

We look forward to your assessment and participating in future phases of the process. If we can be of any assistance, please feel free to contact us.

Many thanks,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**"...the choice is not between wild places and people;  
it is between a rich or impoverished existence for man."  
— Thomas Lovejoy**



July 8, 2016

Interstate 11 Tier 1 EIS Study Team  
c/o ADOT Communications  
1655 W. Jackson St., MD 126F  
Phoenix, AZ 85007  
I-11ADOTStudy@hdrinc.com

**RE: Comments on the ADOT Interstate 11 Corridor Tier 1 Environmental Impact Statement, Nogales to Wickenburg**

Dear Interstate 11 EIS Study Team,

Thank you for the opportunity to submit the following comments in response to the ADOT's Interstate 11 Corridor Tier 1 Environmental Impact Statement, Nogales to Wickenburg.

The southern half of the I-11 Corridor Study Area as defined by the Tier 1 EIS lies within the Madrean Sky Islands. This binational region of mountain ranges and intervening valleys is recognized as a World Biodiversity Hotspot and is treasured for its ecological diversity and the economic vitality it brings in the form of ecotourism and other environmental and quality of life benefits. The region's value is evidenced by the concentration of natural protected areas and public investment in open space and wildlife corridor conservation within the southern portion of the I-11 Corridor Study Area. For 25 years, Sky Island Alliance has engaged the community, local volunteers, and a network of partners to achieve our mission to protect and restore the biodiversity and natural heritage of the Sky Islands. We have a significant interest in the proposed I-11 Corridor and the direct and indirect impacts this project could have on environmental sustainability, climate change adaptation, wilderness, open space, wildlife, air quality, riparian habitat, watersheds, viewsheds, dark skies, noise, vegetation management, and recreational visitor use, as well as to our community and the people who live and work here.

Due to the significant impacts this project would have within our region, we urge ADOT to consider the following recommendations and concerns:

- Justify the need for this project using current growth projections relative to the proposed corridor.
- Analyze and take into consideration the full cost of mitigation measures, and prioritize on-site mitigation, including wildlife crossing structures, over off-site mitigation.
- Analyze an All-Rail Alternative and prioritize expanding multi-modal capacity.
- Avoid any alternatives that propose new highway or bypass routes.
- Avoid or minimize harm to wildlife, wildlife linkages, and open space values.

## **Purpose and Need**

*ADOT should clearly and thoroughly demonstrate the need for this corridor based on the best available science and data.* This includes the most current transportation and growth models for this region, current and projected traffic volumes, and established plans to continue widening I-10 and I-19. Factors that need to be evaluated include how continued climate change will impact Arizona's water resources and project population growth; public health implications; environmental impacts; and long-term impacts on land-use.

Climate change impacts should be considered with increases in vehicle traffic and gas and oil dependency that comes with expanded transportation corridors such as this. Instead of investing time and resources on potential new transportation corridors, we encourage transportation planners to prioritize and develop multi-modal transportation options which will increase the quality of life for residents and visitors and help address the issue of climate change.

ADOT must consider appropriate and justifiable growth projections relative to the proposed corridor, and needs to acknowledge the impact of the corridor on projected growth and growth patterns. The study area for the proposed I-11 should not be arbitrarily limited, nor should the range of options, including the no-build option, all-rail option, and other multi-modal options. ADOT must seriously consider addressing transportation issues via improving infrastructure outside the study area and how improved mass transit both in and outside the study area could improve transportation and reduce the need to construct new roadways. ADOT, as the lead agency for this project, must consider cumulative impacts as well as direct and indirect impacts of the proposed corridor.

*The draft EIS should evaluate whether the current economic structure of the region is sustainable and whether the proposed corridor could exacerbate some of the problems associated with developing a more sustainable economy.* In light of long-term drought, dwindling water resources, more extreme heat, more extreme fires, and the various other implications of climate change, we cannot afford to assume business as usual or that a new major freeway will help the economy.

## **Pima County Resolution No. 2007-343**

*We strongly support the Pima County 2007 elected Board of Supervisor's Resolution No. 2007-343. This Resolution states that Pima County is "in opposition to construction of an interstate highway link that bypasses Tucson and transverses pristine and invaluable Sonoran desert areas."* The Resolution also calls for the continuation of studies relating to the full costs of mitigation measures, and studies relating to expanding multi-modal capacity along I-10, including intercity passenger rail, bicycle and the beautification of the existing corridor. Bypassing the existing Interstate-10 would create environmental, historic, archeological and urban form impacts that cannot be adequately mitigated. Further, we fail to see any need for such construction. The Resolution's arguments need to be addressed in the draft EIS.

## **Impacts to Wildlife Linkages**

*We strongly urge that every consideration is taken to reduce or improve the impact this project will have on wildlife and their ability move east and west across the proposed I-11 Corridor.* Wildlife linkages are becoming increasingly constrained, and this proposed interstate project would impact the ability for wildlife to move as they need between mountain ranges, water sources, protected areas, and essential core habitat areas. *We unfalteringly support the construction of new wildlife crossings (bridges or underpasses) with wildlife exclusion fencing at multiple locations within every key wildlife linkage on the existing Interstate-10 and Interstate-19 corridors.* The existing Interstate-10 and Interstate-19

corridors are one of the largest barriers to wildlife movement in this area, especially when the cumulative impacts of the CAP canal, urban sprawl, and border-related activities and infrastructure are taken into consideration. Alleviating the Interstate barrier is critical for sustainable wildlife populations, and also for human safety through the reduction of wildlife-vehicle collisions.

*The EIS should fully outline the impacts to all of the identified wildlife linkages in the study area (see the attached map provided by SIA, summarizing this information). In Pima County, an Interstate 11 alignment through Avra Valley would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes.* Pima County's Sonoran Desert Conservation Plan, a nationally-recognized regional conservation plan developed and implemented over the last 18 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. In 2006, the Arizona Wildlife Linkages Workgroup, spearheaded by the Arizona Department of Transportation and the Arizona Game and Fish Department, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the Arizona's Wildlife Linkages Assessment. Most recently, in 2012, AZGFD's Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. Any Interstate 11 alternatives that are located in Avra Valley would also sever the Ironwood-Picacho Wildlife Linkage.

The study area also encompasses a highly threatened wildlife linkage between the Tucson and Tortolita Mountains, the Tortolita and Santa Catalina Mountains, and the Tumacacori and Santa Rita Mountains. These wildlife linkages have been the focus of substantial public investment in recent years by the state of Arizona, Pima County, and other local jurisdictions. In March 2016, southern Arizona's first wildlife bridge, funded by Pima County's Regional Transportation Authority, was completed in the Santa Catalina-Tortolita Mountains wildlife linkage. Smaller wildlife underpasses are planned for Tangerine Road and Silverbell Road within the Tucson-Tortolita Mountains wildlife linkage. Impacts to these wildlife linkages, in particular, should be fully considered in the EIS.

Severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they adapt to rapidly changing habitat conditions driven by climate change. The impact of a new highway, severing an important movement area for wildlife, cannot be adequately mitigated off-site.

### **Impacts to At-Risk Species**

*The EIS should fully outline the direct and indirect impacts to all species present in, or near, the project area, and especially those classified as federally "endangered" or "threatened," by the state of Arizona as a "species of concern," and by Pima County as "vulnerable" under the Sonoran Desert Conservation Plan.* These species include, but are not limited to: desert bighorn sheep, jaguar, ocelot, Chiricahua leopard frog, ornate box turtle, Sonoran desert tortoise, Gila monster, giant spotted whiptail, Western yellow-billed cuckoo, Southwest willow flycatcher, Arizona shrew, Swainson's hawk, rufous-winged sparrow, Mexican spotted owl, Yuma clapper rail, Pima pineapple cactus, Nichol Turk's head cactus, Arizona hedgehog cactus, Huachuca water umbel, western red bat, Mexican long-tailed bat, pale Townsend's big-eared bat, lesser long-nosed bat, desert pupfish, Apache trout, Gila topminnow, and razorback sucker.

### **Impacts to Bat Roost Sites**

*We support additional bat roosting opportunities on existing infrastructure to increase needed habitat and roost sites for several important bat species found in the area.* I-10 and I-19 currently provide bat roost habitat on some bridges and culverts, particularly where the Interstate interfaces with the Santa Cruz River and other riparian areas. These roost sites should be maintained and if possible, expanded to additional areas, to provide year-round habitat for at-risk and common native bat species. Surveys should be done to determine which bridges and culverts bats are currently using. I-10 and Ina Road and I-10 and Cortaro Road are examples of places of importance where public investment has already been made to improve bat roosting sites. Bats are essential to managing insect populations, reducing incidences of disease such as Zika (*Aedes aegypti* is one of the most common mosquito species in Pima County and is the Zika vector) and West-Nile Virus, and assisting in the pollination of native and cultivated plants. Bat-friendly structures are simple and cost effective and provide a significant improvement for bat migration and home range movements.

### **Impacts to Connectivity between Jaguar Critical Habitat Blocks**

*Impacts to jaguars and ocelots and their ability to move between the Santa Rita and Tumacacori Mountains must be considered in the draft EIS and impact analysis.* Jaguar Critical Habitat occurs within the defined I-11 Corridor Study Area and both jaguar and ocelot have been recently documented in the Santa Rita Mountains. Although Critical Habitat has not yet been established for the ocelot, ocelots use the same habitat as the jaguars in the Sky Island region and are frequently harbingers of jaguar presence. The ability for jaguars and ocelots to use the identified Tumacacori – Santa Rita Wildlife Linkage across Interstate -19 or the I-11 Corridor is necessary for the movement of these species between the Tumacacori and Santa Rita Mountains, and ultimately necessary for north-south movement across the international border. This provides a critical lifeline for these species to become naturally established in the U.S. Before Jaguar Critical Habitat was created, this wildlife linkage was identified in the Arizona Wildlife Linkage Assessment, Pima County Wildlife Linkage Assessment, and modeled in Dr. Paul Beier's Arizona Missing Linkages Report out of Northern Arizona University. *Further, the cumulative impacts of proposed mining in the Santa Rita and Patagonia Mountains to the east make the integrity and efficacy of this wildlife linkage increasingly important, as it is one of the few providing connectivity to a documented jaguar cross-border linkage, and must be taken into consideration.*

### **Impacts to Protected Areas**

*The EIS should fully outline impacts to Pima County's Conservation Lands System. All possible alignments of Interstate 11 would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS).* The CLS was adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's Comprehensive Land Use Plan. These lands include Important Riparian Areas, Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request rezoning or other discretionary actions from the County. The CLS is a cornerstone of the Sonoran Desert Conservation Plan and has guided many conservation decisions in Pima County since its adoption. Impacts to Pima County's Sonoran Desert Conservation Plan and the CLS should be considered for all potential corridor alignments. All impacts to CLS acreage need to be fully mitigated as close to the area of impact as possible, with habitat as good, or better, than that impacted.



The EIS should fully outline the impacts to all federal and local protected areas and the biological resources they contain. In particular, the study area for the EIS encompasses Avra Valley west of the Tucson Mountains in Pima County. Any alignments considered in Avra Valley would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and planned mitigation lands for Habitat Conservation Plans (HCPs) under development by the City of Tucson, Pima County, and the Town of Marana.

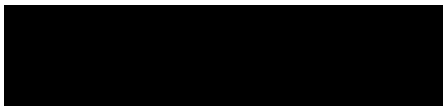
In addition, the study area encompasses other important protected areas including Tortolita Mountain Park, the Hardy Wash system, Arthur Pack Regional Park, Tumacacori National Historical Park, and Wilderness and proposed Wilderness areas including the Tumacacori Highlands, Pajarito Wilderness, and others. All of these protected lands are public investments in conservation. *Reduced ecological values due to the effects of fragmentation by any proposed infrastructure developments, including highways, should be avoided to the greatest extent practicable; any unavoidable impacts should be minimized, and all impacts should be mitigated for to the fullest extent where avoidance and minimization are deemed impossible.*

### **Impacts to Riparian Habitat**

Water is one of our most important resources. *The EIS should fully outline impacts to riparian habitat within the study area. Any possible Interstate 11 alignments through unincorporated Pima County would undoubtedly destroy and/or degrade important, and increasingly rare riparian habitat.* Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of the floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS's Important Riparian Areas and other riparian systems. *Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas.*

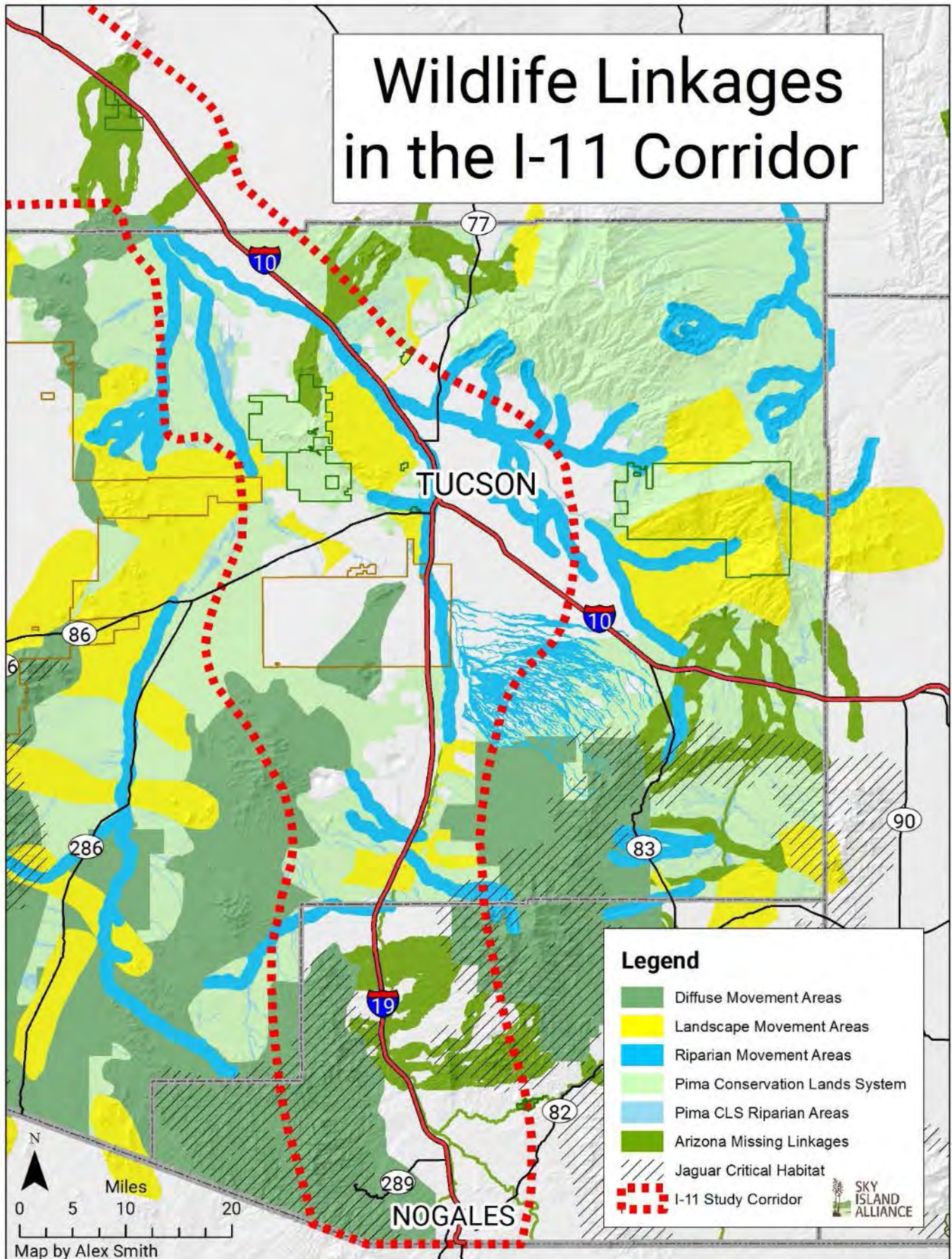
Thank you for the opportunity to provide scoping comments on the Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg. We look forward to your assessment and participating in future phases of the process. If we can be of any assistance, please feel free to contact us.

Sincerely,



*Attached: Wildlife Linkages within the I-11 Corridor Study Area*

# Wildlife Linkages in the I-11 Corridor



**From:** [REDACTED]  
**Sent:** Tuesday, July 05, 2016 10:22 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11 corridor

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern:

As a long time resident of Southwest Arizona, I wish to express my concern that the I-11 corridor is still a possibility for Southern Arizona. The construction of this unnecessary highway would be an environmental disaster, and cause irreparable damage to the Sonoran Desert.

I will fight this proposal with my vote and my money. Please reconsider such a careless and wasteful project in service of the Almighty Dollar.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2016 4:10 PM  
**To:** I-11ADOTstudy  
**Subject:** I11 corridor

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Interested in marana middle school meeting - what time?

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 12:08 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 corridor

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

In my humble opinion, why not expand I-19, I-10 and I-8 to meet demands (if there are any). Why would we consider invading the beauty of our Saguaro Nat'l Park or polluting our Avra Valley water by even considering going thru Avra Valley--not to mention the dark night skies being illuminated (Kitt Peak). Can you imagine all those 18 Wheelers from Mexico spewing fumes as they drive thru our desert. What's more, many private farms and residences would be disturbed. We choose to live in the quiet and beauty of the valley even though we enjoy little conveniences. This pristine area has a beauty found no where else and draws many tourists to Tucson. I HIGHLY object to any part of I-11 being re-routed thru Avra Valley. I know it is just being studied, but that is my opinion.  
Thank you,  
[REDACTED]



**From:** [REDACTED]  
**Sent:** Monday, June 06, 2016 10:08 AM  
**To:** I-11ADOTstudy  
**Subject:** i-11 input

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**From:** [REDACTED]  
**Subject:** i-11 input  
**Date:** June 6, 2016 at 10:01:42 AM MST  
**To:** <[i-11adotstudy@hdrinc.com](mailto:i-11adotstudy@hdrinc.com)>

Hi Public Scoper,

Please tell the folks you are spinning your report for that the people of Arizona do not want the I-11 freeway. This is such a terrible idea. How much faster do you want to export our jobs overseas, export our water through alfalfa shipments to asia and destroy our beautiful landscapes?

Please give up the i-11 project, [REDACTED]

**From:** [REDACTED]  
**Sent:** Tuesday, June 21, 2016 9:57 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11 IS A BAD IDEA

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

## **WHY INTERSTATE 11 IS A BAD IDEA**

1. **I-11 is about jobs...in Mexico.** Among the “Business Case” scenarios projected in the ADOT-NDOT *Corridor Justification Report* is “nearshoring.” That means attracting US companies from China to Mexico where “hourly compensation costs are nearly as low as China.” They propose research and development in Arizona and Nevada and production in Mexico. They call that “integrative manufacturing
2. **I-11 is about stealing good American jobs** from the West Coast and sending them to Mexico where the Port of Guaymas is seen as an “alternative” port that will “attract a share of traffic destined for the United States.”
3. **An I-11 highway through the Avra Valley – the only route really on the table -- would hurt tourism and kill existing jobs.** Saguaro National Park, Arizona-Sonora Desert Museum, Tucson Mountain Park, Kitt Peak, Ironwood National Monument, hundreds of ancient archaeology sites, bighorn sheep, deer, mountain lions and more will be negatively impacted. Existing businesses catering to truckers and tourists along the present I-10 corridor would be hurt along with communities.
4. **The Avra Valley I-11 route proposed by Pima County Administrator Chuck Huckelberry will enrich real estate speculators while evicting 47 local families.** According to Pinal and Pima County Assessor records, Mesa real estate millionaire and two-time political candidate Wilford Cardon owns over 1500 vacant acres along the “Huckelberry Highway” route. Huckelberry has not named the affected property owners.
5. **Some call it “crony capitalism,”** the rich helping each other get richer with taxpayer money. Local millionaire real estate moguls Don Diamond and Diamond Ventures president Eliot Goldstein served on Cardon’s campaign committee in his failed bid for Arizona Secretary of State. Diamond owns 3000 acres along Huckelberry’s “Sonoran Corridor,” a piece of I-11 east of I-19. His “Swan Southlands” project would get a free highway. Huckelberry’s proposed \$30 million for the Sonoran Corridor was decisively rejected by voters as part of the November, 2015, bond package.
6. **If you like I-11, there’s a cheaper way to do it.** ADOT State Engineer Jennifer Toth, speaking at a State Transportation Board meeting in December 2008, raised and dismissed the idea of double-decking a piece of the existing I-10, from Ruthrauff to I-19. It would, she said, accomplish everything ADOT wanted, but would cost too much. What she didn’t say was that while the cost-per-mile of double-decking is higher, double-decking just six miles of I-10 would

cost one-third of the \$3 billion the 56-mile highway proposed by Huckelberry adds up to. That would save taxpayers nearly \$2 billion! ADOT's numbers.

7. **Part of I-11 in the Avra Valley will be elevated**, according to Huckelberry. That's because there is only an 80-foot right-of-way on Sandario Road at Mile Wide between the Tohono O'odham Nation and the federal Bureau of Reclamation's Wildlife Mitigation Corridor established when the CAP canal was built. I-11 needs at least several hundred feet ROW, preferably 2,000 feet.
8. **An Avra Valley I-11 route is in violation of the Board of Supervisors' own policy.** In BOS Resolution 2007-343, Pima County policy stated: "NOW, THEREFORE BE IT RESOLVED that the Pima County Board of Supervisors opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological and urban form impacts could not be adequately mitigated."

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

We can't cure the world of sorrows,  
but we can choose to live in joy.  
--Joseph Campbell



**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2016 1:03 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Meeting 6/21/2016

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Will the Powerpoint presentation used at the meeting yesterday be made available on your website? It provides a consolidated package of the various graphics & info from your web page.

regards,

[REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, July 01, 2016 6:16 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Project

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Don't cut through natural wildlands and the Saquaro National forest. Leave these untamed and uncut lands alone find alternatives using existing travel corridors.  
Peace,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 9:21 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11 proposal

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear I-11 Study Team,

We would like to voice our opposition to the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West. Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, view-sheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.

We are also concerned about impacts to federally and locally protected open space, including Ironwood Forest National Monument, Saguaro National Park, the Bureau of Reclamation's Central Arizona Project mitigation corridor, City of Tucson mitigation lands for their Avra Valley Habitat Conservation Plan, and Pima County mitigation lands for their Multi-Species Habitat Conservation Plan.

We are in agreement with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." Under the right circumstances, we could support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2016 6:45 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 public comment, 6/22/16 open house  
**Attachments:** i\_11 public comment.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To Whom It May Concern:

It is way past time for all levels of our government to consider the true needs of the people for whom decisions concerning our collective future are being made, and nationwide, travelers have expressed a strong desire for multimodal options beyond the automobile. We, the citizens, are exasperated by seeing transit-based projects that we support be proposed with one hand, while the other hand undermines the potential success of those programs by prioritizing implementation of out-dated plans. We are especially tired of our elected officials being told that they have to rob Peter to pay Paul to do so, when the ultimate goals of each agency should be compatible and complimentary, rather than contradictory and competitive. It is possible to accomplish that sort of synergistic cooperation, as demonstrated in many cities and countries worldwide. Arizona wants to be connected, both with the other major surrounding regions, and within as well as between our own municipalities. Our road network is already essentially complete, so instead of paving a single new travel lane, capacity should first be maximized within the existing roadway footprint by adding passenger rail, with additional freight considerations as each situation warrants. Being in Arizona, we are among the sunniest areas in the nation, making the potential nearly unlimited for solar-powered high-capacity transit vehicles, whether light rail, streetcar, or electric bus. If shaded with photovoltaic panels, as are many of TUSD's athletic fields, park-n-rides can serve double-duty as local, or regional, transit hubs and public charging stations for last-mile trips with electric passenger vehicles and even electric bicycles.

<http://solartoday.org/2014/05/tucson-schools-getting-11mw-of-pv/>

ASUM is one of a handful of student-led transit agencies in the United States, demonstrating that the next generation of transit market leaders will regard sustainable transport as a priority rather than a luxury...

“As part of our ongoing effort to innovate service, align with student advocacy and reduce our carbon footprint, we take great pride in our decision to go electric. We hope this encourages – and challenges – other universities to seriously consider the economic and environmental benefits of zero-emission buses.”

Founded in 1999 by a student referendum, ASUM Transportation has a unique history of fostering student governance and tackling critical issues to ensure a safe and efficient transit experience for the university's population. Since its inception, ASUM's weekly ridership has grown to nearly 15,000; last year alone it provided more than 400,000 complimentary rides to students, faculty and visitors and 14 percent of all trips to campus occur on ASUM's UDASH service. ASUM's purchase of zero-emission, battery-electric buses is a testament to its community leadership and environmental stewardship and will help the UM meet its goals of carbon neutrality by 2020. When the Proterra buses enter service in September 2016, ASUM Transportation expects them to immediately improve local air quality, reducing emission by 1,392 tons over their 12-year lifespan.

<http://www.proterra.com/first-student-led-transit-agency-in-the-u-s-to-prioritize-ev-mass-transit/>

To lure Ho Chi Minh City residents away from personal modes of transit, the city is building a more modern transportation infrastructure. When the project is complete, Ho Chi Minh City will have six metro rail lines (also referred to as the MRT system), three light rail lines, and a bus rapid transit (BRT) system, moving the seven million people who live in its center, and 10 million on the fringe. The first MRT began construction in 2012 and is scheduled to open in 2018.

The resilience-minded project includes an inter-operator fare-collecting system (similar to London's Oyster Card or Switzerland's Swiss Pass, which let travelers access all modes of transport with an all-access pass), and an integrated traffic management system (ITMS).

The integrated traffic system — surveillance cameras, traffic signals, sensors, messaging signs and more — will cost the city \$299 million initially. Add that to the inter-operator fare system, and the bill could be around \$700 million. However, Siemens estimates that the benefits of this system will override the costs in the long run: Such an investment could mean \$1.6 billion in savings.

<https://nextcity.org/daily/entry/moving-from-moped-to-metro-transit>

“As most everyone knows who commutes to work using the region’s roads and highways or the MBTA, the area’s transportation system is not meeting current demand and certainly not potential demand,” says the report...

The transit system, which carries almost 20 percent of Greater Boston’s commuters, will absorb 25,000 new riders a day, according to the report — which predicts a slightly higher rate of growth for transit use than driving.

<https://nextcity.org/daily/entry/booming-boston-gridlock-commuting-traffic-transit-growth>

Presumptive Democratic nominee Hillary Clinton will speak at the US Conference of Mayors in Indianapolis on Sunday and, in doing so, she'll be facing the urban leaders who are increasingly at the forefront of innovative policy change...

Former Secretary of State Clinton is expected to discuss [the strengthening of federal-local partnerships](#) to address issues faced by cities across the country including public safety and crime, mass transit expansion, and water and air quality...

Phoenix Mayor Greg Stanton [attended a climate change summit in China](#) last week to share lessons from his efforts to transform Phoenix into a leading sustainable city. An extensive new light rail and bike lane system contributed to the city's [7.2 percent decrease in greenhouse gas emissions in seven years](#).

One of the most natural policy areas for mayors to take a leading role is in the planning of sustainable cities. Recognizing the power of local leaders to design creative ways to integrate new technologies into their localities, the [US Department of Transportation \(DOT\) launched the Smart City Challenge](#) in December, as Ben Thompson previously reported for The Christian Science Monitor. Seventy-eight cities submitted proposals to fully utilize technologies in their transportation networks, including the integration of self-driving buses and citywide travel planning apps.

<https://www.yahoo.com/news/clinton-address-mayors-conference-mayors-innovators-155110966.html>

ADOT has already completed a Tier 1 EIS for the majority of the proposed I-11 route; please see the attached comment form for a visual depiction of this situation. Thank you for your consideration on this important matter.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**"be the change** you wish to see in the **world..."** -Gandhi





# ADOT Interstate 11 Corridor Tier 1 Environment Impact Statement NOGALES TO WICKENBURG

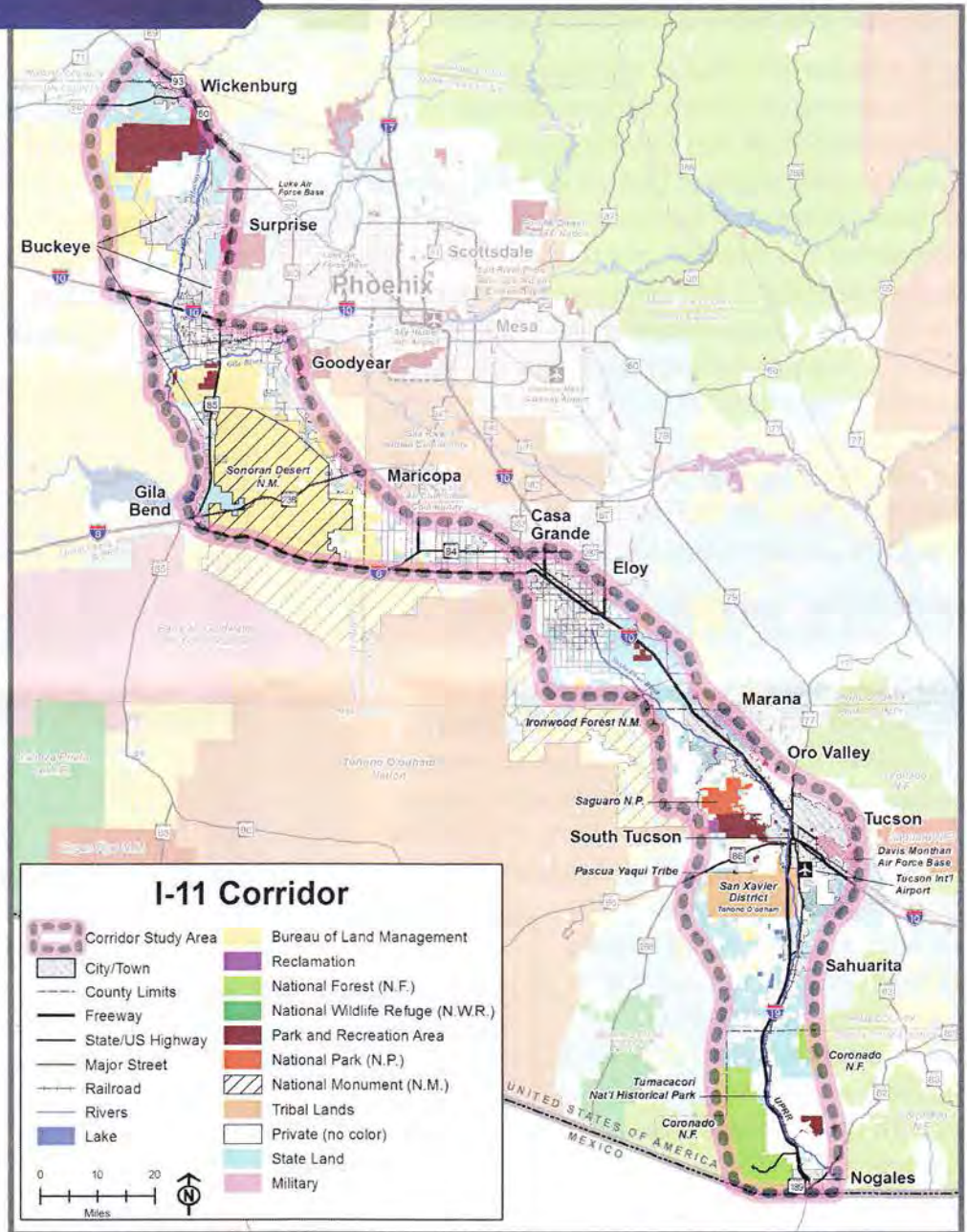
FACT SHEET | SPRING 2016

## ABOUT INTERSTATE 11

In partnership with the Federal Highway Administration (FHWA) and regional planning agencies, the Arizona Department of Transportation (ADOT) has launched a three-year environmental study to select a corridor alternative for a portion of the Interstate 11 (I-11) Corridor, specifically between Nogales and Wickenburg.

## STUDY GOALS

- Provide access-controlled, north-south transportation corridor
- Connect key metropolitan areas and markets in Arizona with Mexico and Canada
- Support improved regional mobility for movement of people, goods, and homeland security
- Provide enhanced transportation opportunities for economic vitality



## ABOUT THE CORRIDOR STUDY AREA

The Corridor Study Area is 280 miles long and traverses four counties—Maricopa, Pinal, Pima and Santa Cruz—and is anywhere between five and

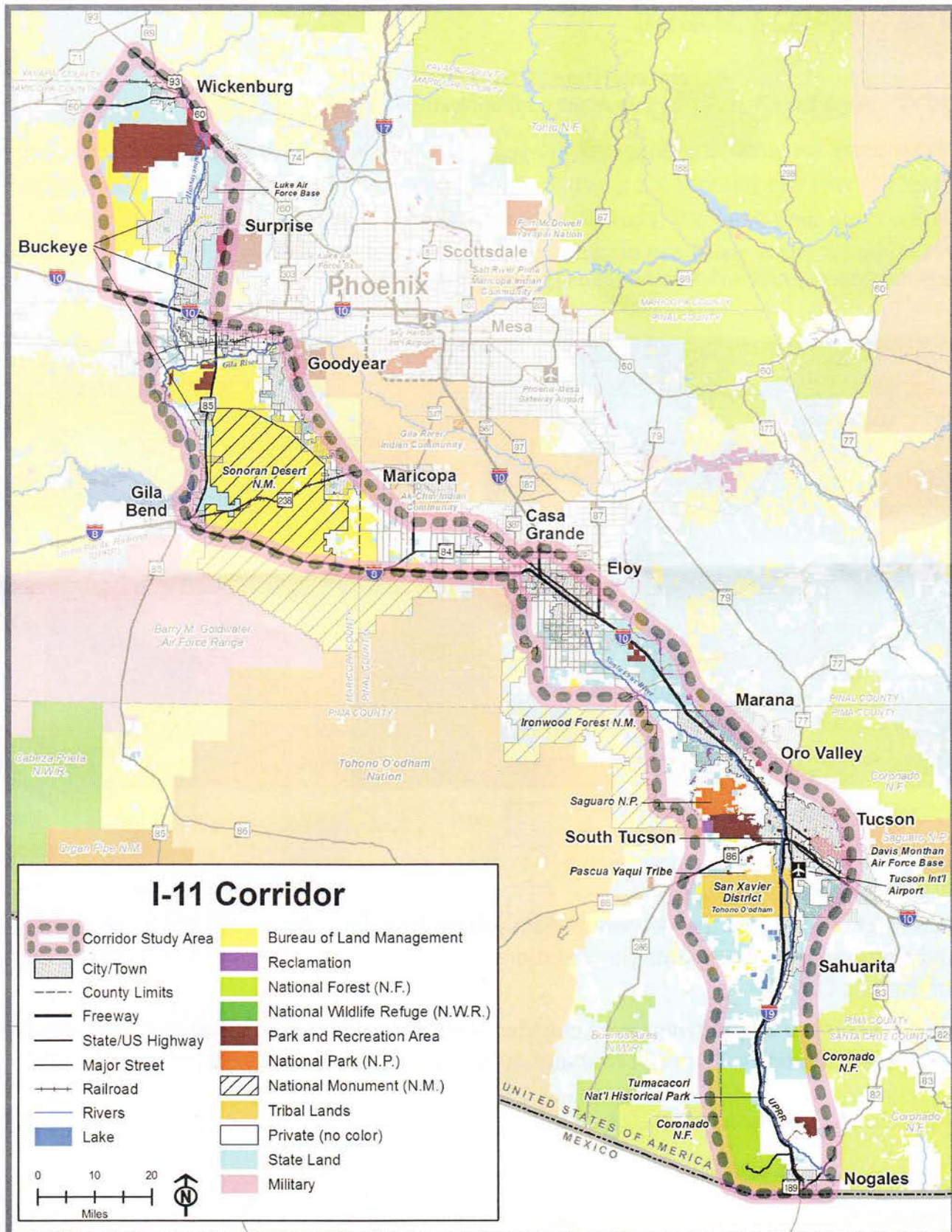
25 miles wide. The purpose of the study will be to identify a Selected Corridor Alternative within this area.



# Impact Statement (NOGALES TO WICKENBURG)

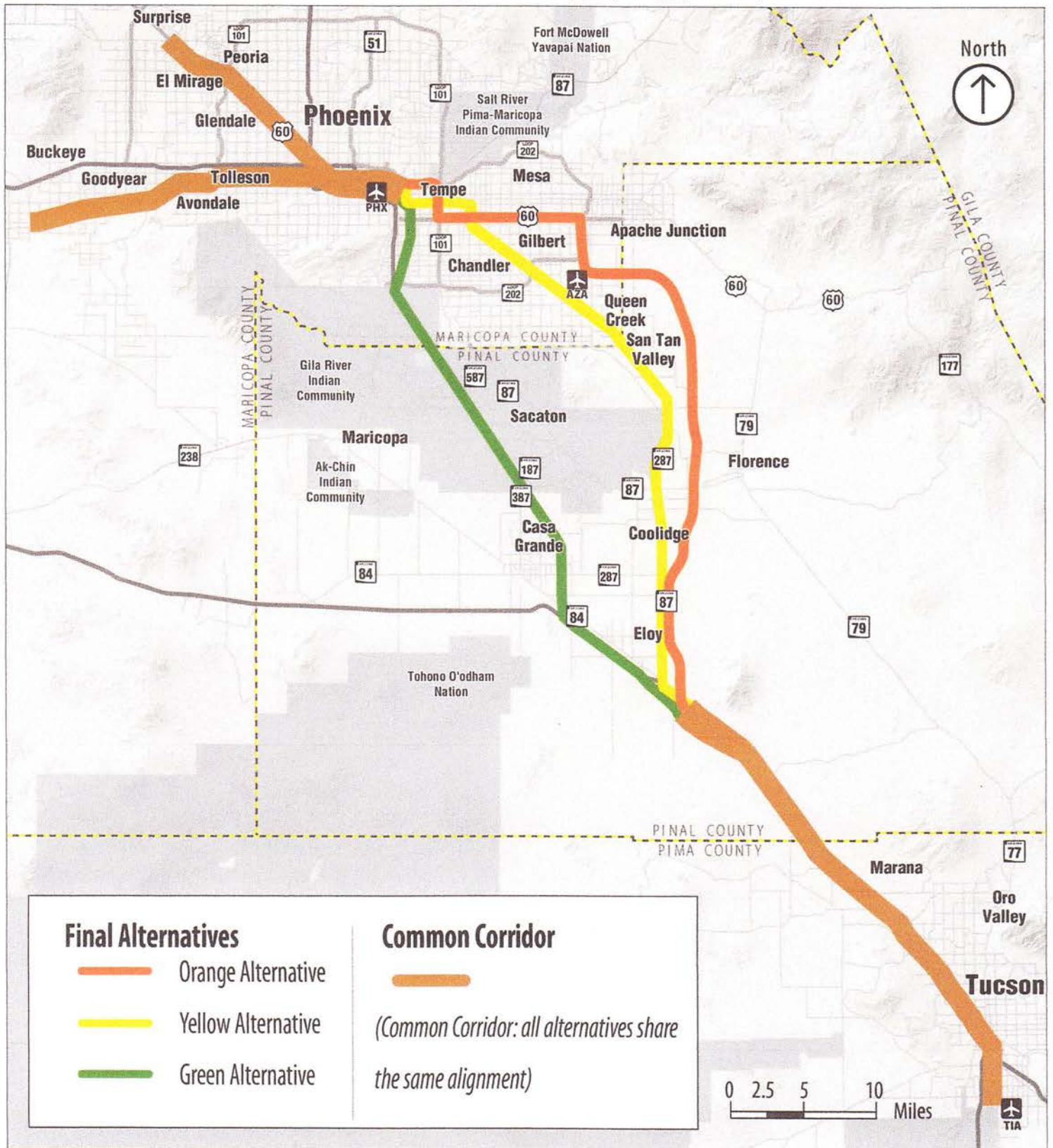
PUBLIC SCOPING SURVEY | JUNE 2016

Please use this map to provide any comments on specific areas, ideas and concerns.



*Thank you for your continued interest in the I-11 Study.*





<http://www.azdot.gov/planning/currentstudies/PassengerRail/>

### 1.4.3 Southwest Regional Context

Each alternative rail corridor was assumed to connect in the future to a larger regional western states rail network connecting California, Arizona, and Nevada, including the California High-Speed Rail System. As identified as part of the *Southwest Multi-State Rail Planning Study* (FRA 2014), the western network is envisioned to include a high-speed rail connection between Phoenix, Las Vegas, and Los Angeles. High-level design and system performance assumptions were made to be compatible with the potential future regional network shown in **Figure 1-2**.

**Figure 1-2. Future Western Regional Rail Network**



Source: *Southwest Multi-State Rail Planning Study* (FRA 2014)

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2016 12:23 PM  
**To:** I-11ADOTstudy  
**Subject:** i11 Route - Avoid Tucson Mountain Park

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I object to the i-11 proposed route that runs near Tucson Mountain Park and Saguaro Park West.

It is too close to the parks and will bring noise and pollution into these pristine areas.

Save our parks and natural areas for everyone!

Thanks, [REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Tuesday, June 14, 2016 3:22 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Scoping Comments  
**Attachments:** 6-14-16 Comments.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello,  
Please review and include the attached comments in the scoping phase of the Tier 1 EIS. I also sent a copy of these comments today via the USPS.

Thank you and sincerely,  
[REDACTED]



June 14, 2016

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

Thank you for the opportunity to submit comments during the scoping phase of the Tier 1 Environmental Impact Statement (EIS). Last March, I submitted comments regarding the Alternative Selection Report (ASR) which are attached to this correspondence. Please consider all of the topic areas included in that letter pertaining to a route through the Avra Valley as scoping issues.

In addition to these previously identified items, there is another issue that renders the Avra Valley as an unsuitable infrastructure corridor. That issue is available right-of-way, and it appears there is no suitable public right-of-way through the Avra Valley. This is a critical scoping issue.

Utilizing Pima County MapGuide and the map associated with the Pima County Road Proceedings Number 0862 (Book 7, Page 44), I reviewed the land ownership along 1.5 miles of Sandario Road which is bordered on the east by the Bureau of Reclamation Tucson Mitigation Corridor, and on the west by the Tohono O'odham Nation.

This research into the existing Sandario Road right-of-way was done to illustrate that Pima County does not appear to control more than 80' of right-of-way along a 1.5 mile stretch between the Bureau of Reclamation Tucson Mitigation Corridor and the Tohono O'odham Nation.

I understand Pima County Administrator Chuck Huckelberry has proposed elevating the I-11 in this location. Without additional right-of-way, I believe 80' is an insufficient width in which to accommodate surface highway or bridging structures let alone any additional infrastructure components such as future rail and/or utilities.

In recent correspondence with the Bureau of Reclamation, I understand they continue to oppose any further development within the Tucson Mitigation Corridor or use of the Corridor for anything that could adversely affect plants, wildlife, or wildlife movement for which the Corridor was established. Their position has remained consistent through many infrastructure challenges including the recent SunZia Southwest Transmission Project.

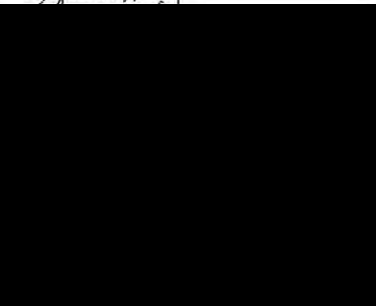
Unless the Tohono O'odham Nation chooses to provide right-of-way, I do not believe there is land in this location of Avra Valley that can be utilized for I-11. It is for this reason that I think the potential for right-of-way acquisition is a critical scoping issue.

In contrast to the land ownership situation in the Avra Valley, the other route likely to be considered for a future I-11 has existing right-of-way already in place. That route is along the existing I-10 corridor.

Again reviewing maps available from Pima County MapGuide, I see that immediately south of the intersection of I-10 and Speedway Blvd. in a fairly narrow section of I-10, there is approximately 425' of existing right-of-way, plus 100' of existing right-of-way for rail traffic, and no doubt an easement for the existing high voltage electrical transmission lines located west of I-10. According to the June public meeting display boards, I-11 will require 400' of right-of-way, plus an additional 100' for rail, and 200' for utility infrastructure. Clearly the right-of-way needed for a future I-11 already exists in this location.

My research indicates that between these two potential corridors for a future I-11, incorporation of a new highway into the existing I-10 alignment, rather than dealing with all the issues associated with acquiring right-of-way in the Avra Valley, is a great deal more economically feasible. As a final note, the economic issues pale in comparison to the environmental impacts of constructing a new highway in the Avra Valley.

Please consider this issue as well as the many others I raised in my March letter as reasons why an Avra Valley route is unsuitable for transportation and other infrastructure development, and therefore should be eliminated from consideration as a potential corridor.

Sincerely, 

Attachments:

March 16, 2016 Correspondence



March 16, 2016

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

Thank you for the opportunity to provide comments during preparation of the I-11 Alternatives Selection Report (ASR). As the ASR proceeds, it seems likely that the Avra Valley located west of Tucson will be considered a potential corridor. There are a number of issues associated with this particular area that render it unsuitable for transportation and other infrastructure development, and therefore it should be eliminated from consideration as a potential corridor.

First is the existence of the Central Arizona Project Tucson Mitigation Corridor that physically and biologically connects Pima County's Tucson Mountain Park with the Tohono O'odham Nation and the mountains to the west. This 4.25 square mile corridor was acquired by the Bureau of Reclamation as partial mitigation for construction of the Central Arizona Project. It is managed by Pima County and Arizona Game and Fish is a third party to the cooperative agreement that states this area is only to be used to preserve plants and wildlife and to provide an undeveloped corridor for wildlife movement. The Bureau of Reclamation, Pima County Board of Supervisors, and the Arizona Game and Fish Department opposed the previously proposed I-10 Bypass and SunZia Transmission Project through this area. I strongly urge you to contact the Bureau of Reclamation Phoenix Area Office, the Pima County Board of Supervisors, and the Arizona Game and Fish Department regarding the Tucson Mitigation Corridor. The I-11 and Intermountain West Corridor Study – Corridor Concept Report recognized the importance of the Tucson Mitigation Corridor and recommended a future I-11 be sited along the existing I-10 and I-19.

In addition to the agencies noted above, the National Park Service opposed the I-10 Bypass and the SunZia Transmission Project in this location due to inconsistencies with the establishment of Saguaro National Park including its designated wilderness area. The National Park Service recommended that an Environmental Impact Statement consider the effects on natural resources including the spread of invasive species and habitat fragmentation, degradation of cultural resources, and visual impacts from sensitive viewing areas such as the Arizona-Sonora Desert Museum. The SunZia Transmission Project subsequently removed this corridor from consideration due to the potential impacts. I suggest you contact Darla Sidles Superintendent of the Saguaro National Park regarding their concerns.

The Pima County Tucson Mountain Park Management Plan addressed the Tucson Mitigation Corridor, lease properties such as the Arizona-Sonora Desert Museum, and the management of visual, biological, and cultural resources. 62% of visitors to Tucson Mountain Park visit the Arizona-Sonora Desert Museum and park road pull outs. These areas overlook the iconic Sonoran Desert landscape of the Avra Valley, and an interstate corridor in this location may result in negative impacts to the multi-million dollar tourist industry in southern Arizona. Please contact the Pima County Natural Resources, Parks and Recreation Department to discuss this project.



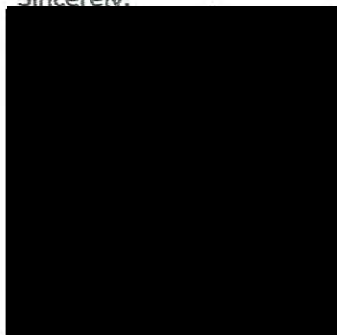
Tucson Mountain Park and the Tucson Mitigation Corridor are part of the Pima County Conservation Lands System. The Pima County Sonoran Desert Conservation Plan identified priority vulnerable species, cultural resources, special management areas, and critical linkages that may be impacted by a highway in this location. The Sonoran Desert Conservation Plan contains a wealth of information regarding these resources and I urge you to contact the Pima County Administrator's Office to access this data.

Local roads such as Sandario Road, Kinney Road, and Gates Pass Road are designated Major Scenic Routes by the Pima County Zoning Code and the intent of that designation is to preserve and enhance the visual resources of the natural and built environment. Areas within one mile of Saguaro National Park, Tucson Mountain Park, and the Tucson Mitigation Corridor are within the Pima County Buffer Overlay Zone which is an area designated to foster wildlife habitat. Most of the private land adjacent to Saguaro National Park, Tucson Mountain Park, and the Tucson Mitigation Corridor is included in the Resource Transition Zone land use category of the Pima County Comprehensive Plan, and development of these lands is to blend with the natural landscape and support environmentally sensitive linkages.

In closing, I sent an email comment to Michael Kies, Director of ADOT Multi-Modal Planning and the HDR team on March 7, 2016 to point out that the Tucson Mitigation Corridor was omitted from the I-11 Corridor Study Area Map found on the project website, and requesting the map be updated to include the Tucson Mitigation Corridor and the correct boundary of Tucson Mountain Park. To date, the map remains unchanged.

I am very interested in participating in this project as it may relate to the Avra Valley and appreciate being included in your mailing list.

Sincerely,



**From:** [REDACTED]  
**Sent:** Sunday, July 03, 2016 9:17 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Study /Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Madam/Sir

I would like to congratulate your department on conducting very informative meetings.

I am the land owner in Tonopah, AZ as well as Land Realtor.

Tonopah will be the perfect place to have I-11 go through.

As this highway is going to connect all the way from Canada to Mexico and passing by Las Vegas and Arizona, it will bring lot of commerce business and Trucking.

East part of your study corridor already has 303 and Sun Valley Park way.

There is no north south highway in Tonopah and it is not heavily populated so it will have a minimal environmental impact.

I also recommend the I11 should be from Baumgarten Road in Eloy to I-8 west to old us 80 going north along the west border of the study corridor.

Thanks

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Monday, July 04, 2016 10:45 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11 study area comments

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I am a concerned citizen and a property owner in the west Maricopa County, Arizona.

My suggestions for the proposed I-11 are as follows;

Highway I-11 coinciding with the West boundary of the proposed area is recommended because of the following;

There are already 303 and Sun Valley Pk. way on the east / center of the proposed area. I-11 needs to be away from these towards the west so that it provides a new alternatives to share the new projected and existing traffic loads.

There are no nearby highway(s) further west of the study area. This will be a new convenient alternative serving west side traffic needs.

West side along the boundary of the proposed area will have minimum environmental impact. This area is not heavily populated.

Thank you for asking the interested people to voice their inputs.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 10:04 AM  
**To:** I-11ADOTstudy  
**Subject:** I11 Study Area

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Mr. Van Echo,

I own land in Tonopah. I would like to suggest that the west valley boundary line of the study, since this will benefit west valley residents tremendously. Currently, there is no north/south freeway in the west valley, so this would be helpful to residents that live in the west valley and commute to the east valley.

Best Regards,

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 1:07 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Study Area

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Mr. Kies

I am a large landowner in Tonopah.

I would really recommend the west valley boundary line of the study area. This would enormously assist the west valley residents due to the absence of north south freeway further west. This would also spur growth and development in the area, since it would open up transportation to the east valley.

Thank you for your cooperation in this matter.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 10:59 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Study Area

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Mr. Van Echo,

I am a large owner of land in Tonopah. I would really like to recommend the west valley boundary line for the I-11 freeway. This will be monumental for growth in that area. Since most of the private available land is in the west valley, as the city of Phoenix grows, the path of growth will take place in the west valley.

Please take this into consideration. We would also be willing to donate land to make this a reality. Would be happy to meet regarding this matter.

Best regards,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



**\*\*This email message is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Nothing in this communication should be interpreted as a digital or electronic signature that can be used to authenticate a contract or other legal document. The recipients are advised that the sender is not qualified to provide, and have not been contracted to provide, legal, financial, or tax advice, and that any such advice regarding any investment by the recipients must be obtained from the recipients'**

attorney, accountant, or tax professional. Vermaland, LLC or its related entities & the officers/representatives.

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 10:47 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11 study area

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Mr. [REDACTED],

I own land in Tonopah. I would like to suggest the west valley boundary line of the study, since this will benefit west valley residents tremendously. Currently, there is no north/south freeway in the west valley, so this would be helpful to residents that live in the west valley and commute to the east valley. This would spur growth and development in the area significantly and bring economic growth and development in the area.

Best regards,

[REDACTED]



**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 10:47 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Study Area

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I am a large land owner in Tonopah and I would really like to recommend the west valley boundary line of the study area.

We don't have any freeways going north/south in this area. One could potentially live in Buckeye and work in Chandler. The west valley is one of the only areas in Phoenix with private land left. As the population of Phoenix grows, these areas will need the appropriate infrastructure in place.

Thanks for your help and cooperation with this.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 10:12 AM  
**To:** I-11ADOTstudy  
**Subject:** I11 Study Area

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear [REDACTED]

I am a large landowner in Tonopah.  
I would really recommend that West valley boundary line of the study area. This would enormously assist the west valley residents due to the absence of north south freeway further west. This would also spur growth and development in the area, since it would open up transportation to the east valley.

Thank you,

[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 1:08 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 study area

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear [REDACTED]

I am a large landowner in Tonopah.

I would really recommend the west valley boundary line of the study area. This would enormously assist the west valley residents due to the absence of north south freeway further west. This would also spur growth and development in the area, since it would open up transportation to the east valley.

Thank you for your cooperation in this matter.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, June 10, 2016 3:27 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 Study Notification List

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please add me to the I-11 Study Notification email list.

Thanks

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, May 26, 2016 2:19 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 study

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Looks like all that needs to be done is upgrade the existing interstates in the corridor to at least six lanes.  
Make AZ -85 an interstate from I-8 to I-10 with appropriate ramps at Butterfield I-8 exit.  
Build a new interstate west of Buckeye and Wickenburg north from I-10 mp 100 to AZ-93 northwest of Wickenburg.

Least cost and impact for this road.

[REDACTED]

Sent from my iPad

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2016 2:39 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11 study

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good afternoon. [REDACTED] I talked to a person who has his finger on the pulse of Rocky Point Mexico. He tells me that they are building a cruise ship pier there. It will be operational in two or three years. This will greatly increase traffic on Highway 85. We already have a increase in traffic for there and Yuma dunes. Just passing this along.

**From:** [REDACTED]  
**Sent:** Thursday, June 23, 2016 7:59 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

It appears that [REDACTED] ADOT is managing a project that has outlived its usefulness.

I-11 is a 20th-century idea that has been overtaken by technology. Carbon-based fuels for energy generation are in decline: coal, oil, and natural gas, in that order of weakness. The need for railroad shipment of coal, especially from Wyoming, is dying. Crude oil shipped by rail presents a serious fire threat to populations along the line. Crude oil and natural gas can be shipped efficiently by pipeline, which requires large capital investment, not attractive for resources in permanent decline.

Renewables are ascendant in electricity generation, which will likely require investment in the National Grid for transmission by direct current, perhaps super-cooled. (A belated victory for Nikola Tesla over Thomas Edison.)

We don't know the assumptions about shipping volumes of various industries, which led to the 1995 federal legislation, concluding that this corridor was necessary. For example, if Canada was expected to export timber, wood products and meat, and import fresh fruits and vegetables, the effect of climate change might render those estimates highly inaccurate. Meanwhile the whole concept of a multi-modal corridor seems to be downplayed, reducing it to a road improvement project.

That's enough speculation for now. [REDACTED]

**From:** [REDACTED]  
**Sent:** Tuesday, June 21, 2016 2:41 AM  
**To:** I-11ADOTstudy  
**Subject:** I-11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Why?? Do we need this interstate? Expand I-10 instead

Sent from my iPhone



**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 12:34 PM  
**To:** I-11ADOTstudy  
**Subject:** I-11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Best to keep it close to I-10  
Skirt Tucson Phoenix  
And is it really needed

Your reply appreciated

Sent from my iPhone

**From:** [REDACTED]  
**Sent:** Tuesday, June 28, 2016 7:37 PM  
**To:** I-11ADOTstudy  
**Subject:** I-19 traffic increase

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

The proposal takes I-11 to the West off I-19 at Sahuarita Road. Why isn't this takeoff South of Green Valley instead at the Northern boundary of Green Valley? Same question with the proposed cutoff to I-10. There is bound to be a substantial increase in heavy truck traffic because of I-11, its already very heavy and only getting worse. Green Valley is divided in half by I-19; property values are already adversely affected by current traffic, this will only get worse. Aside from the fact that I-11 is a stupid idea in the first place, why compound it with stupid route planning? Could it be that land South of Green Valley isn't owned by some insider?  
Sent from my iPad

**From:** [REDACTED]  
**Sent:** Tuesday, June 28, 2016 9:39 PM  
**To:** I-11ADOTstudy  
**Subject:** Interstale 11

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Sir/Mam

I would not like this near me . I am at Kinney Rd area and your route would impact way to much land for animals . Also might add light pollution in area would go way high. I moved to get away from light pollution and interstate 10 area. Now you want to back door us and surround us. I can see the Huckberry is talking to Tucson City council for a new Annexation attempt on our area again.

**From:** [REDACTED]  
**Sent:** Thursday, June 30, 2016 10:31 AM  
**To:** I-11ADOTstudy  
**Subject:** Interstate 8

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Interstate eight is an underutilized freeway. It has light traffic. It has a wide right of way easement. It has a good transition at Interstate ten. There is a transition planned for highway eighty five.

**From:** [REDACTED]  
**Sent:** Tuesday, July 05, 2016 11:04 AM  
**To:** I-11ADOTstudy  
**Subject:** Interstate 8

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

ADOT has a design for a transition interchange between Interstate Eight and Highway Eighty Five. They have a purchased a lot of right of way for this.

**From:** [REDACTED]  
**Sent:** Saturday, July 09, 2016 4:22 PM  
**To:** I-11ADOTstudy  
**Subject:** Interstate 11 Corridor Tier 1 EIS

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Gentlemen:

I attended the meeting at Marana Middle School on June 23th. It has taken awhile for me to decide how best to present my questions regarding this issue without clouding them with my emotional bias. I understand the problems that ADOT has been burdened with through a mandate by the federal government. I also recognize that any part of I-11 that can impact the Avra Valley area becomes additionally problematic by the social and economic conditions that are prevalent.

My first question is: Can the Tier 1 Environmental Impact Statement (T1EIS) include suggested programs to improve economic conditions in Avra Valley? Reviewing the study goals from your handout, I feel that things could go a lot smoother for all parties if you can demonstrate how each goal will be met in the area. The first stated goal is "Provide access-controlled north-south transportation corridor." Where will the recommended access points be located and what associated infrastructure changes would be required?

The second goal is "Connect key metropolitan areas and markets in Arizona with Mexico and Canada." What are the criteria to be a "key metropolitan area or market"? The Avra Valley area has great potential to be a significant metropolitan area and market for not only our national neighbors but also the people of the United States. Much of that potential hinges on the implementation of goal 1. Will future growth be factored into the T1EIS?

The third goal "Support improved regional mobility for movement of people, goods, and homeland security" is somewhat puzzling for the Avra Valley area. With the existing paths from the Mexican Border to Pinal County the area already has sufficient mobility for people and goods and very limited ability to examine or evaluate homeland security. Of course the people and goods currently using this thoroughfare do not always benefit the United States. So for Avra Valley we would need to realign the kind of people and goods through the area and demonstrate improvement in homeland security. Planning to develop Avra Valley into a key metropolitan area would meet these goals.

The final goal is "Provide enhanced transportation opportunities for economic vitality." In order to have a plan that will sit well with the residents of Avra Valley specifics on the enhancements and opportunities would need to be listed. I understand that commitment to such a program would require input and adoption by more than just ADOT but such cooperation would go a long way to acceptance in the area.

How the stated goals are met is very important to the residents of Avra Valley. You can garner meaningful support for the T1EIS and the I-11 project in general by addressing them with the people in mind. The biggest fear that I see is that if proper planning is not implemented, Avra Valley could be viewed similarly to the desolation described in the song "The City of New Orleans." Such an outcome would be completely contrary to the stated goals and very harmful to the people.

I hope the next set of meetings and the project progress can be acceptable to more people.

Thank You

[REDACTED]



Virus-free. [www.avast.com](https://www.avast.com)

**From:** [REDACTED]  
**Sent:** Friday, July 08, 2016 9:00 AM  
**To:** I-11ADOTstudy  
**Subject:** Interstate 11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear developers,

I have noticed that Interstate 11 is not needed and will not be great in the Tucson area. We already have Interstate 10 going through Tucson and traffic facilitates very well on it. It will have a negative impact by caused great amounts of noise pollution and light pollution at night for those exploring Saguaro National Park, Ironwood National Monument, and Tucson Mountain Park. This will be extremely exemplified at the Desert Museum, an economic driver of Tucson and extremely popular area for recreation. Even though there will be wildlife corridors for the animals moving between Saguaro National Park and Ironwood National Monument this will not stop the negative impact on wildlife from not being able to cross Interstate 11.

Thank You for reading my comments, [REDACTED]

Sent from my iPad



**From:** [REDACTED]  
**Sent:** Wednesday, June 29, 2016 4:46 PM  
**To:** I-11ADOTstudy  
**Subject:** Let us come up with another solution

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

I was shocked – as a native Arizonan who was born here in 1953 – to hear of yet another “freeway solution” to transportation congestion in this state. Why are we using such outmoded thinking?

There is no need for this corridor. It is time to get serious about either a short term solution (expanding I-10) or a long range, intelligent solution like light rail.

I am also deeply concerned at the possible impact this will have on wildlife corridors. All of my non-profit giving goes to support wildlife causes in Arizona. I am not alone in wanting to protect the most vulnerable among us. And the most vulnerable are not the trucking companies and individual vehicles who travel by highway in this state, it is the animals that rely on rapidly shrinking habitat to live their very lives. We are threatening that with this plan. There will also be impact on important cultural heritage sites.

It is time to treat this state and its animals and its heritage with respect. It is time to be innovative, bold and creative and not rely on 1950’s style solutions to problems in 2016. Please reconsider this plan and do not move forward with it.

Submitted most respectfully,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Monday, July 04, 2016 10:30 AM  
**To:** I-11ADOTstudy  
**Subject:** New proposed I-11 inputs.

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello!

I am a concerned citizen and a property owner in the west Maricopa County, Arizona.

My suggestion for the proposed I-11 are as follows;

Highway I-11 coinciding with the West boundary of the proposed area is recommended because of the following;

There are already 303 and Sun Valley Pk. way on the east / center of the proposed area. I-11 needs to be away from these towards the west so that it provides a new alternatives to share the new projected and existing traffic loads.

West side along the boundary of the proposed area will have minimum environmental impact. This area is not heavily populated.

Thank you for asking the interested people to voice their inputs.

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, June 30, 2016 2:51 PM  
**To:** I-11ADOTstudy  
**Subject:** No to I-11 freeway in Avra Valley

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Dear Sirs and Madams,

I would like to submit my opposition to the construction of the new I-11 freeway through Avra Valley. There is no need for a new freeway. I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. I am in agreement with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated."

Under the right circumstances, I will be willing to support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.

Thank you for your consideration of my opinion.  
Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, June 22, 2016 4:00 PM  
**To:** I-11ADOTstudy  
**Subject:** notification list for interstate 11 study

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi, can you add my name to the notification list for the EIR phase 1 study currently underway. Thanks

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 7:57 PM  
**To:** I-11ADOTstudy  
**Subject:** Other route.

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

If push came to shove another option would be to go on Interstate eight to the Sentinel Interchange, go north thru Hyder to Haraquale to Interstate ten and the Salome road to Highway ninety three.

**From:** [REDACTED]  
**Sent:** Friday, June 03, 2016 10:54 PM  
**To:** I-11ADOTstudy  
**Cc:** [REDACTED]  
**Subject:** Please include me in any new developments regarding proposed routes between Tucson and Wickenburg. [REDACTED]

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 10:08 AM  
**To:** I-11ADOTstudy  
**Subject:** Project Manager I 11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear [REDACTED]  
Project Manager, I-11

I own a lot of land in Tonopah and am also a Realtor.  
As there is no north south freeway farther west, the West valley boundary line of the study area would be really beneficial for the west valley residents.

Best Regards,

[REDACTED]

**From:** [REDACTED]  
**Sent:** Tuesday, May 31, 2016 8:52 AM  
**To:** I-11ADOTstudy  
**Subject:** proposed alignment

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I have a farm/business and home at [REDACTED], and I'd like to keep track of the proposed alignment in relation to my location.

Could you please send or direct me to a pdf of the latest proposed alignment nearest my location?

The study area map is too general for my use.

Thank you.

[REDACTED]  
[REDACTED]



**From:** [REDACTED]  
**Sent:** Wednesday, June 29, 2016 5:36 PM  
**To:** I-11ADOTstudy  
**Subject:** Proposed I-11 Highway

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Dear Sirs:

I am opposed to the construction of the proposed I-11 bypass route through the Avra Valley West of the Tucson Mountains. I agree with a 2007 resolution of the Pima County Board of Supervisors that opposed the construction of any new highways in or around the County whose purpose is to bypass the existing Interstate 10 and Interstate 19 highways. Like the Supervisors, I believe the environmental, historic, and archeological impacts of the proposed I-11 corridor could not be mitigated.

Sincerely,

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 4:35 PM  
**To:** I-11ADOTstudy  
**Subject:** public comment re Interstate 11 from Tucson Mountains Association

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

July 7, 2016

Tucson Mountains Association (TMA) strongly opposes the Interstate 11 corridor from Nogales to Wickenburg as currently envisioned.

TMA is the resident association of record for a large area spanning portions of the City of Tucson, unincorporated Pima County, and Marana. TMA is the oldest resident organization in the State of Arizona, established in 1934. It includes the area bounded on the north by Twice Peaks Road, on the east by Silverbell Road, on the south by the 22<sup>nd</sup> Street Alignment/Starr Pass Boulevard, and on the west by the Saguaro National Park and Tucson Mountain Park.

Our mission includes working to preserve the Sonoran Desert, protecting adequate wildlife linkages in Tucson and Pima County, advocating for a sensible and appropriate water policy in our region, and advancing the economic and other interests of the residents of the Tucson Mountains.

Construction of a new highway in the area of the proposed I 11 corridor which currently has no transportation or telecommunications infrastructure would cut off essential wildlife linkages, destroy the desert environment and ecosystem, and require huge amounts of fossil fuel and water to build and maintain. It would also harm the economic activities of numerous businesses along Interstate 10, many of which are used by or employee residents of the Tucson Mountains. Finally, the construction, maintenance and use of this new highway would add to dust and noise pollution in sensitive wildlife and national and city park areas adjacent to the new highway.

For all of these reasons, we urge you to either choose a “no build” option, or plan for an improvement in the current Interstate 10 using non-fossil fuel energy sources, employing state of the art methods for dust and noise abatement and local labor.

Thank you.

[REDACTED]

Tucson Mountains Association Board of Directors

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 8:08 PM  
**To:** I-11ADOTstudy  
**Subject:** railroad

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

If there were talks between the Railroad, the city of Phoenix Sanitation department and ADOT to get rail to the Patterson road Landfill that would take about fifty trucks a day off the roads in Phx and Hway 85. That would reduce air pollution in the Phoenix area a lot. The railroad could use the Highway Eighty Five right of way. It would reduce the Phoenix Sanitation Department costs and extend the life of the landfill by baling the garbage. Chanute Kansas does this. There is no need to daily cover the trash when it is baled. It also reduces the amount of energy used to get the garbage from the home to the landfill.

**From:** [REDACTED]  
**Sent:** Thursday, June 09, 2016 3:32 AM  
**To:** I-11ADOTstudy  
**Subject:** Re: ADOT launches Interstate 11 environmental study from Nogales to Wickenburg

**Follow Up Flag:** Follow up  
**Flag Status:** Completed



I support the Hassayampa freeway alignment (*see map by Maricopa Association of Governments*) between I-8 and I-10 to avoid congestion which would be created if I-11 is merged with heavy traffic going to and from Los Angeles and San Diego. I am familiar with local transportation issues because I reside between Gila Bend to Buckeye, and presented my thesis “Annexation and Growth in the Desert”, published by San Diego State University in December 2014.

#### *Route*

Beginning in Casa Grande, if the corridor follows Interstate 8 to Gila Bend, turning North on Highway 85, the use of existing roadways is fiscally sound and pose no additional environmental challenges. From Highway 85, I-11 should generally follow the proposed Hassayampa alignment, the Phoenix bypass route, to Wickenburg.

However, new bridge construction, within a few hundred feet south of the historic Gillespie Bridge as recommended by Maricopa County engineers, and adjoining biologically significant riparian wetlands should be avoided. The new Gila River crossing should be built further south. South of Arizona State Prison (Lewis), an interchange and frontage road exist which could economize the transition of I-11 from the highway 85 corridor where it would veer to the west, generally following the Patterson road corridor, crossing old highway 80 and the Gila River, then north along Enterprise road to the Hassayampa alignment. The West side of Enterprise road is bound almost entirely by BLM lands, so acquiring right-of-way is relatively straightforward.

Building a new bridge further south would help to preserve habitats for sensitive, diverse populations of birds and wildlife. The Hassayampa alignment would support orderly growth in the west valley and avoid traffic congestion.

I would like to participate in the June 15 meeting in Buckeye, but I am in Colorado for the summer. Can I participate or hear part of the meeting by telephone?

Thank you,

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** I-11ADOTstudy <I-11ADOTstudy@hdrinc.com>

**Sent:** Friday, April 1, 2016 2:58 PM

[REDACTED]

**Subject:** RE: ADOT launches Interstate 11 environmental study from Nogales to Wickenburg

Mr. [REDACTED],

Thank you for your interest in the I-11 environmental study from Nogales to Wickenburg.

The Corridor Study Area map found on the study website ([www.i11study.com/arizona/study-area.asp](http://www.i11study.com/arizona/study-area.asp)) and shows the Corridor Study Area within the dotted black and pink line. We are just beginning the environmental process, which will include analysis of multiple alternatives within this Corridor Study Area.

You have been added to our email list to receive updates on the study and opportunities to provide input as we develop corridor alternatives.

Thank you again for your comment, and please feel free to contact us with additional comments or questions.

Sincerely,

**Interstate 11 Tier 1 EIS Study Team**

c/o ADOT Communications

1655 W. Jackson St., Mail Drop 126F

Phoenix, AZ 85007

**Website:** [i11study.com/Arizona](http://i11study.com/Arizona)

**Email:** [i-11ADOTStudy@hdrinc.com](mailto:i-11ADOTStudy@hdrinc.com)

**Toll-free bilingual telephone hotline:** 1-844-544-8049

---

[REDACTED]

**Sent:** Thursday, March 17, 2016 12:59 AM

**To:** I-11ADOTstudy

**Subject:** Fw: ADOT launches Interstate 11 environmental study from Nogales to Wickenburg



A three-year environmental study will consider possible routes between Nogales and Wickenburg. The first step is developing an Alternatives Selection Report assessing a wide range of corridor alternatives and options, along with opportunities and constraints. A Draft Tier 1 Environmental Impact Statement will evaluate in greater detail a smaller number of corridor alternatives, including segments that may advance as independent projects. There will be a no-build alternative as well.

Input from the public, communities and other stakeholders will contribute to these two reports, as well as a Final Tier 1 Environmental Impact Statement that will list a selected corridor alternative.

“The Arizona Department of Transportation and our partner agencies and stakeholders have long recognized the importance of the Interstate 11 corridor and the benefits that it will bring to our state through trade, commerce, job growth and economic vitality,” ADOT Director John Halikowski said. “This congressionally designated high-priority corridor offers the opportunity for Arizona to stay competitive, create regional and global connections, and provide a direct link to success in the global marketplace.”

In November 2014, the Arizona and Nevada departments of transportation completed a two-year feasibility study as the first step in the Interstate 11 process. ADOT focused on and supported a route through Arizona connecting Nogales and the Hoover Dam bypass bridge near Las Vegas.

In December 2015, Congress approved the Fixing America’s Surface Transportation Act, five-year legislation to improve the nation’s surface transportation infrastructure. While the FAST Act formally designates Interstate 11 from north to south in Arizona, it does not include funding. It does, however, make the corridor eligible for federal funding in the future.

The recommended I-11 corridor would likely follow US 93 from the Hoover Dam bypass bridge south to Wickenburg. The 280-mile corridor study area for the current environmental study begins in Wickenburg and runs west of the Phoenix metropolitan area and then south to the Tucson area and then Nogales.

During the next three years, the public, communities and other stakeholders will have opportunities to comment through regular meetings, community events and other forums. Right now, comments can be sent to:

- Email: [I-11ADOTStudy@hdrinc.com](mailto:I-11ADOTStudy@hdrinc.com)
- Toll-free bilingual telephone hotline: 1-844-544-8049
- Mail:  
Interstate 11 Tier 1 EIS Study Team  
c/o ADOT Communications  
1655 W. Jackson St., Mail Drop 126F  
Phoenix, AZ 85007

For more information about the I-11 study, visit [i11study.com/Arizona](http://i11study.com/Arizona)

---

Learn about transportation projects and processes, as well as current events and safety tips, at the [ADOT blog](#).

SUBSCRIBER SERVICES:  
[Manage Preferences](#) | [Delete Profile](#) | [Help](#)

For more information, visit [azdot.gov](http://azdot.gov)

---

Sent on behalf of ADOT by GovDelivery, Inc. • 206 S. 17th Ave • Phoenix, AZ 85007 • 602.712.7355



▪



**From:** [REDACTED]  
**Sent:** Friday, June 24, 2016 2:27 PM  
**To:** I-11ADOTstudy  
**Subject:** Re: Avra Valley Proposed Route

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Completed

Hi,

While I respect your quick response, I still would like my questions answered. This looks like a canned response. Please answer my questions or have someone who can contact me.

Thanks,

[REDACTED]  
[REDACTED]

On Friday, June 24, 2016 2:14 PM, I-11ADOTstudy <I-11ADOTstudy@hdrinc.com> wrote:

Dear [REDACTED],

Thank you for contacting the I-11 Study Team. Your email and comments will be documented in the project record, and a response will be included in the Scoping Summary Report that will be produced following the close of the comment period on July 8. It is currently anticipated the Scoping Summary Report will be available on the I-11 study website (i11study.com/Arizona) later this summer.

Sincerely,

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

Website: i11study.com/Arizona

Email: [I-11ADOTStudy@hdrinc.com](mailto:I-11ADOTStudy@hdrinc.com) <<https://hdrwebmail.hdrinc.com/owa/redir.aspx?REF=DbCLUNYPdTTBo1y5VueHv08R6fv4vv3MUPVnI8RVxLHGQ1kJdJzTCAFodHRwczovL2hkcnDIYm1haWwuaGRyaW5jLmNvbS9vd2EvcmVkaXluYXNweD9SRUY9dFdGcnYyYXNvVUJWMGdHVGk3bWIGN25GOG1SQ2cxVmhfRGJVSUhxbHJINEh6WnZlYUp6VENBRnRZV2xzZEc4NmFTMHhNVUZVDFSVGRIVmtlVUJvWkhKcGJtTXVZMjl0>>

Toll-free bilingual telephone hotline: 1-844-544-8049

---

From: [REDACTED]  
Sent: Monday, June 06, 2016 3:26 PM  
To: I-11ADOTstudy  
Subject: Avra Valley Proposed Route

Dear Sir/Madam,

I live in a subdivision at Anway Road and Manville Road. In looking at the map for the proposed I11 route through Avra Valley, it looks as if this interstate will go right through our subdivision. I'm assuming if this is the case that we will have our houses purchased through eminent domain. I would like to know the timeframe for this process. My husband and I are currently exploring the thought of selling our home. However, with the proposed path of the interstate coming through our subdivision; I'm sure it would be difficult to sell. Of course, if we are only talking about a couple of years until the state buys our home we would probably try to wait. In looking at the on-line information it really doesn't give me any idea how long this process takes.

Please give me a timeframe and verify I'm correct in my assumption about it coming through our subdivision. The subdivision is called Tucson Avra West and I live at [REDACTED]  
[REDACTED]

Thanks,

[REDACTED]

**From:** I-11ADOTstudy  
**Sent:** Tuesday, July 05, 2016 2:04 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Comments on Interstate 11 Tier 1 Environmental Impact Statement

Dear Mr. Marshal,

Thank you for contacting the I-11 Study Team. Your email and comments will be documented in the project record, and a response will be included in the Scoping Summary Report that will be produced following the close of the comment period on July 8. It is currently anticipated the Scoping Summary Report will be available on the I-11 study website ([i11study.com/Arizona](http://i11study.com/Arizona)) later this summer.

Sincerely,

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

**Website:** [i11study.com/Arizona](http://i11study.com/Arizona)  
**Email:** [i-11ADOTStudy@hdrinc.com](mailto:i-11ADOTStudy@hdrinc.com)  
**Toll-free bilingual telephone hotline:** 1-844-544-8049

---

**From:** [REDACTED]  
**Sent:** Friday, July 01, 2016 2:23 PM  
**To:** I-11ADOTstudy  
**Cc:** [REDACTED]  
**Subject:** Comments on Interstate 11 Tier 1 Environmental Impact Statement

Dear Sir/Madam: Please accept our comments on the Interstate 11 Tier 1 Environmental Impact Statement.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]

**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 1:22 AM  
**To:** I-11ADOTstudy  
**Subject:** Re: New proposed I-11 inputs.

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Thank you for responding back to my I-11 study comments. Upon further exploration of I-11 route to minimize the environmental impact I will request to include my following comment.

Please include my comments that to minimize the environmental impact of the I-11 highway the preferred route will be Baumgarten Road to I-8 to Old US 80.

Thanks Again.

[REDACTED]

---

**From:** I-11ADOTstudy <I-11ADOTstudy@hdrinc.com>  
**To:** [REDACTED]  
**Sent:** Tuesday, July 5, 2016 2:12 PM  
**Subject:** RE: New proposed I-11 inputs.

Dear Mr. Gupta,

Thank you for contacting the I-11 Study Team. Your email and comments will be documented in the project record, and a response will be included in the Scoping Summary Report that will be produced following the close of the comment period on July 8. It is currently anticipated the Scoping Summary Report will be available on the I-11 study website ([i11study.com/Arizona](http://i11study.com/Arizona)) later this summer.

Sincerely,

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

**Website:** [i11study.com/Arizona](http://i11study.com/Arizona)  
**Email:** [i-11ADOTStudy@hdrinc.com](mailto:i-11ADOTStudy@hdrinc.com)  
**Toll-free bilingual telephone hotline:** 1-844-544-8049

---

**From:** [REDACTED]  
**Sent:** Monday, July 04, 2016 10:30 AM

**To:** I-11ADOTstudy

**Subject:** New proposed I-11 inputs.

Hello!

I am a concerned citizen and a property owner in the west Maricopa County, Arizona.

My suggestion for the proposed I-11 are as follows;

Highway I-11 coinciding with the West boundary of the proposed area is recommended because of the following;

There are already 303 and Sun Valley Pk. way on the east / center of the proposed area. I-11 needs to be away from these towards the west so that it provides a new alternatives to share the new projected and existing traffic loads.

West side along the boundary of the proposed area will have minimum environmental impact. This area is not heavily populated.

Thank you for asking the interested people to voice their inputs.

██████████

**From:** [REDACTED]  
**Sent:** Tuesday, May 31, 2016 9:47 AM  
**To:** I-11ADOTstudy  
**Subject:** Re: proposed alignment

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

In addition, can you tell me at what stage in the study will exits/connections to the alignment be determined?

Thanks,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

On Tue, May 31, 2016 at 8:52 AM, [REDACTED] wrote:

I have a farm/business and home at [REDACTED] and I'd like to keep track of the proposed alignment in relation to my location.

Could you please send or direct me to a pdf of the latest proposed alignment nearest my location?

The study area map is too general for my use.

Thank you.

[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 5:05 PM  
**To:** I-11ADOTstudy  
**Subject:** Remarks about the proposed route's for Interstate Eleven

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

7 July 2016

**Subject:** Future I-11 Corridor Remarks

**To:** Whom It May Concern:

**From:** [REDACTED]

I respectfully submit these remarks about the two proposed routes of the new I-11 corridor from Nogales, AZ and points North, at least for my part, to as far as Wickenburg, AZ.

In reviewing the Corridor Study Area Map options, I offer these suggestions for serious consideration:

In thinking about this corridor, as it starts from the south, at the Arizona/Mexico border at Nogales AZ, I must say, regardless of where it enters the US from Mexico, presumably at or near Nogales, AZ, the track North **should be only on the West side as depicted in the ADOT I-11 Corridor map.**

Thinking about how, this new traffic route would be controlled at that port of entry, both North and South traffic, and too as a "connector access point" at the connector points in or near the communities along along these two illustrated routes, when you may have the need for "West to East" and/or "East to West" junctions that must be available for vehicles to enter or exit from, and to, the several communities, towns, cities on the East side of the "West" track of the New I-11. As an example: On the current I-19 corridor, ease of access to and from the following communities will be better served, now and in the future, by choosing the "West" side track of the proposed I-11 track. So, from Nogales northward there is these communities: Rio Rico, Tumacacori, Tubac, Arivaca Junction, Amado, Continental, Green Valley, Sahuarita and the city of South Tucson, AZ.

**RATIONAL:** If the East track corridor, as depicted on your map, were chosen, those residents, commuters or travelers on that side **will not have "clear" or "easy" access to the corridor because of the Santa Cruz River and the Union Pacific Railroad, which will cause huge barriers and delays for all trying to cross or go to the West side of these communities.** My judgment would be that this same rational would surely be the same by the folks in Tucson proper, if the East route were chosen.

Furthermore, by not choosing the East corridor, the towns of Three Points, Sells, and a vast expanse of the Indian Reservation will have better access to the West corridor track, both North and South by choosing the new West side track I-11.

I contend too, that the West route would prove more acceptable on this West side track by mostly skirting congested parts of Tucson, Marana, Eloy and the positive interconnect possibility at the junction of Interstate Eight which would likely infuse higher use of I-8 heading west to Gila Bend and further to Yuma, and San Diego, CA. and the connecting junction at Gila Bend to AZ Route 85 north to I-10 at Buckeye, west of Phoenix.

Another positive reason to choose the West route north through Surprise and near Luke AFB is that these two areas are densely populated and building a new interstate on the East track, proposed on the map, would seem to me be very disconcerting, if not outright hostile, by those people in these nearby communities along the East track. Choosing the less dense Westerly track would avoid such, almost sure, resistance from the populace there.

To conclude: From my perspective, what I put forward here in sighting avoidance of populated areas/communities, as much as possible, the full length of the possible East proposed route should be less contentious and safer for all the communities it passes if the East track were chosen, at least up to Wickenburg. The West corridor track, is the best choice.

I would welcome a response.  
Thank you.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



**From:** [REDACTED]  
**Sent:** Thursday, May 26, 2016 4:51 PM  
**To:** I-11ADOTstudy  
**Subject:** Rest area

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please make funds available to open the rest area at SR 87 and 188. I saw this in the proposal and hope it comes to be. We who travel this route often truly need it!

[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my iPad

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 7:31 PM  
**To:** I-11ADOTstudy  
**Subject:** right of way

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

When Highway eighty five was widened to four lanes from Patterson road to Gila Bend there was a environmental study done. At that time there was large purchase of right of way because ADOT did not want to furnish access to a lot of property. This gives us lot of right of way already purchased.

**From:** [REDACTED]  
**Sent:** Thursday, May 26, 2016 11:19 AM  
**To:** I-11ADOTstudy  
**Subject:** Route I-11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Sirs,

I have reviewed the study area and see there are two proposed crossings of Interstate 10. One crossing is along the alignment of SR 85. The other crossing is west of this route. I have several parcels in the area and was wondering if the I-11 corridor will impact any of the sites.

Could you tell me approximately where the westerly crossing is proposed - 300th Ave? 335th Ave? or wherever

Thanks,

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 7:43 PM  
**To:** I-11ADOTstudy  
**Subject:** routes.

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Connecting Sun Valley Parkway and Highway Sixty would be another option toward keeping air pollution out of the Valley. Trucks going to Phoenix could exit onto Interstate Ten at Buckeye also reducing pollution in the Phoenix area.

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 2:57 PM  
**To:** I-11ADOTstudy  
**Subject:** Scoping Comment Letter  
**Attachments:** Interstate 11 Scoping Letter July 2016.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please accept the enclosed scoping comment letter from Friends of Saguaro National Park.



# *Friends of Saguaro National Park*

*providing financial and volunteer support to Saguaro National Park*

July 7, 2016

Interstate 11 Tier 1 EIS Study Team  
c/o ADOT Communications  
1655 West Jackson Street, MD 126F  
Phoenix, AZ 85007

**RE: Scoping Comments on the Interstate 11 Tier 1  
Environmental Impact Statement, Nogales to Wickenburg**

To Whom It May Concern:

***Friends of Saguaro National Park*** is a 501(c)(3) partner of the National Park Service, created to help preserve, protect and enhance the fragile environment and unique cultural heritage of the Sonoran Desert at Saguaro National Park. Our mission is to help protect wildlife and habitat...promote environmental education...improve recreational trails...enhance visitor experiences...and build environmental stewardship for the Park. Since our founding in 1996, ***FOSNP*** has sought to establish collaborative partnerships within the Tucson community, develop a broad donor base, and provide both funding and volunteer support for some of the Park's most critical needs.

I write to express the unanimous opposition of our Board of Directors to the proposed Interstate 11 segment through the Avra Valley, west of the Tucson Mountains. We believe that any alignments considered for the Avra Valley would negatively impact thousands of acres of protected public lands, including Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, and the Bureau of Reclamation's Central Arizona Project Mitigation Corridor.

The ***Friends of Saguaro*** Board of Directors has approved a resolution in opposition to the construction of an Interstate 11 corridor alignment through the Avra Valley, noting *"...this suggested corridor would cut through sensitive habitat recommended for protection by Pima County's landmark Sonoran Desert Conservation Plan . . . sever critical wildlife movement corridors, and effectively block all animal migration from the Tucson Mountains to the west . . . disturb an unknown number of important archeological sites . . . impede washes and negatively impact surface water flows . . . and aggravate the spread of invasive plants."*

The Board's resolution further states that *"...this suggested corridor would degrade the visitor experience at Saguaro National Park by eliminating the natural quiet . . . destroying the scenic viewsheds . . . threatening the survival of native wildlife species . . . and polluting the air in a national park that is afforded additional federal protections by the Wilderness Act of 1964."*

Thank you for your consideration of our scoping comments on the Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg. We would urge your re-consideration of the need for any new corridor through the Avra Valley, and encourage your exploration of expansion or upgrades to existing transportation alignments.

Sincerely,



**From:** [REDACTED]  
**Sent:** Friday, July 08, 2016 4:28 PM  
**To:** I-11ADOTstudy  
**Cc:** [REDACTED]  
**Subject:** Scoping Comments for the Interstate 11 Tier 1 EIS, Nogales to Wickenburg  
**Attachments:** CSDP I-11 Final Scoping Comments with attachment 070816.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern:

Attached are scoping comments from the Coalition for Sonoran Desert Protection on the Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg.

Thank you for the opportunity to submit these comments and we look forward to continued involvement in this process as it moves forward.

We also want to note that one of our supporters submitted an earlier draft of these comments dated July 7, 2016 as an attachment to their personal comments in an email. Please file the comments attached to this email, dated July 8, 2016, as our official scoping comments on this EIS.

If we can be of any further assistance, please do not hesitate to contact us.

Sincerely,

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]





## Coalition for Sonoran Desert Protection

300 E. University Blvd., Suite 120  
Tucson, Arizona 85705  
p (520) 388-9925 • f (520) 791-7709  
www.sonorandesert.org

July 8, 2016

Arizona Center for Law  
in the Public Interest  
Arizona Native Plant Society  
Bat Conservation  
International  
Cascabel Conservation  
Association  
Center for Biological  
Diversity  
Center for Environmental  
Connections  
Center for Environmental  
Ethics  
Defenders of Wildlife  
Desert Watch  
Empire Fagan Coalition  
Environmental and Cultural  
Conservation Organization  
Environmental Law Society  
Friends of Cabeza Prieta  
Friends of Ironwood Forest  
Friends of Madera Canyon  
Friends of Saguaro National  
Park  
Friends of Tortolita  
Gates Pass Area  
Neighborhood Association  
Genius Loci Foundation  
Native Seeds / SEARCH  
Northwest Neighborhood  
Alliance  
Protect Land and  
Neighborhoods  
Safford Peak Watershed  
Education Team  
Save the Scenic Santa Ritas  
Sierra Club – Grand Canyon  
Chapter  
Sierra Club – Rincon Group  
Sky Island Alliance  
Sky Island Watch  
Society for Ecological  
Restoration  
Sonoran Permaculture  
Guild  
Southwestern Biological  
Institute  
Tortolita Homeowners  
Association  
Tucson Audubon Society  
Tucson Herpetological  
Society  
Tucson Mountains  
Association  
Wildlands Network  
Women for Sustainable  
Technology

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

### **RE: Scoping Comments on the Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg**

To Whom It May Concern:

The Coalition for Sonoran Desert Protection appreciates the opportunity to provide scoping comments for the *Interstate 11 Tier 1 Environmental Impact Statement (EIS), Nogales to Wickenburg*.

We submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection, founded in 1998 and comprised of 34 environmental and community groups working in Pima County, Arizona. Our mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan. We achieve this mission by advocating for: 1) protecting and conserving Pima County's most biologically rich areas, 2) directing development to appropriate land, and 3) requiring appropriate mitigation for impacts to habitat and wildlife species.

In summary, our scoping comments highlight the need for further evaluation of the purpose and need for this project and major environmental impacts that should be considered statewide and particularly in Pima County as this study area is evaluated. Specifically, potential environmental impacts in Pima County include impacts to federal lands such as Saguaro National Park, Ironwood Forest National Monument, and the Bureau of Reclamation's Central Arizona Project Mitigation Corridor; local conservation lands such as Tucson Mountain Park, planned mitigation lands for federal Incidental Take Permits and Habitat Conservation Plans under development by the City of Tucson, Pima County, and Town of Marana, and Pima County's Conservation Lands System; critical wildlife linkages and connectivity between large wildland blocks as described in Arizona's Wildlife Linkages Assessment, the Coyote-Ironwood-Tucson Wildlife Linkage, the Ironwood-Picacho Wildlife Linkage, and the 2012 Pima County Wildlife Connectivity Assessment conducted by the Arizona Game and Fish Department (AzGFD); and increasingly rare riparian habitat.

## **Purpose and Need**

First and foremost, we strongly believe that ADOT should clearly and thoroughly demonstrate the need for this corridor based on the best available science and data. This includes the most current transportation and growth models and current and projected traffic volumes. The analysis must include established plans to continue widening Interstate 10 and improving capacity from Mexico's Mariposa Port of Entry and the recent approval of ADOT's 2017-2021 Five Year Plan. Elements of this Five Year Plan that must be considered include, but are not limited to, State Route 189: Nogales to Interstate 19; Interstate 19: Ajo Way traffic interchange, and; Interstate 10: State Route 87 to Picacho, Earley Road to Interstate 8, Ina Road traffic interchange, Houghton Road traffic interchange, Ruthrauff Road traffic interchange, Kino Parkway traffic interchange, and Country Club Road traffic interchange.

Also of note is Representative Ann Kirkpatrick's July 5, 2016 announcement of \$54 million secured in a highway grant for ADOT's I-10 Phoenix to Tucson Corridor Improvements Project, via the U.S. Department of Transportation's competitive FASTLANE program. Tucson Mayor Rothschild said, "Completing expansion of I-10 between Tucson and Phoenix, which now alternates between two and three lanes in each direction, will result in a safer, more efficient highway for people and freight, and that's very good news for Tucson, Phoenix and the state as a whole."<sup>1</sup>

## **Major Environmental Impacts for Evaluation**

### ***Impacts to Federal and Local Protected Areas***

The EIS must fully analyze the direct, indirect and cumulative impacts to all federal and local protected areas and the biological resources they contain in the entire study area. For example, in Pima County the study area for the EIS encompasses Avra Valley west of the Tucson Mountains. Any alignments considered in Avra Valley would negatively impact Saguaro National Park, Tucson Mountain Park, Ironwood Forest National Monument, the Bureau of Reclamation's Central Arizona Project Mitigation Corridor, and planned mitigation lands for federal Incidental Take Permits (ITPs) and Habitat Conservation Plans (HCPs) under development by the City of Tucson, Pima County, and the Town of Marana. The Pima County Multi-Species HCP was officially approved by the U.S. Fish and Wildlife Service (FWS) as published in the Federal Register on May 13, 2016, and the 30-year ITP will be voted on by the Pima County Board of Supervisors in September 2016. Tucson's Avra Valley HCP was submitted to the FWS in November 2014 and is currently under review. The Marana HCP is currently on hold.

---

<sup>1</sup> See <http://www.wbtv.com/story/32378220/southern-az-receives-grant-to-improve-i-10-between-phoenix-and-tucson>.

In addition, the study area in Pima and Pinal Counties encompasses smaller, yet still vitally important, local protected areas such as Tortolita Mountain Park, the Hardy Wash system and Arthur Pack Regional Park, and others. All of these protected lands are public investments in conservation.

For the entire project, please note that reduced ecological values due to the effects of fragmentation by any proposed infrastructure developments, including highways, should be avoided to the greatest extent practicable; any unavoidable impacts should be minimized; and all impacts should be mitigated to the fullest extent where avoidance and minimization are deemed impossible.

### ***Impacts to Wildlife Linkages***

The EIS must fully analyze the direct, indirect and cumulative impacts to all of the identified wildlife linkages in the entire study area. For example, in Pima County an Interstate 11 alignment through Avra Valley would sever critical wildlife linkages that have been identified for protection by state and local agencies through various planning processes. Pima County's Sonoran Desert Conservation Plan, a nationally-recognized regional conservation plan developed and implemented over the last 18 years, identifies a Critical Landscape Connection across the Central Arizona Project canal in Avra Valley. The Arizona Wildlife Linkages Workgroup, spearheaded ADOT and AzGFD, identified the Avra Valley linkage zone and Ironwood-Tortolita linkage zone in the 2006 Arizona's Wildlife Linkages Assessment. And most recently, AzGFD's 2012 Pima County Wildlife Connectivity Assessment identified and modeled the Coyote-Ironwood-Tucson Wildlife Linkage Design, including large swaths of land in Avra Valley. Any Interstate 11 alternatives that are located in Avra Valley would also sever the Ironwood-Picacho wildlife linkage.

The study area also encompasses a highly threatened wildlife linkage between the Tucson and Tortolita Mountains and skirts the edge of another highly threatened wildlife linkage between the Tortolita and Santa Catalina Mountains. Both of these wildlife linkages have been the focus of substantial public investment in recent years by the state of Arizona, Pima County, and other local jurisdictions. In March 2016, the Sonoran Desert's first wildlife bridge, funded by Pima County's Regional Transportation Authority, was completed in the Santa Catalina-Tortolita Mountains wildlife linkage. Smaller wildlife underpasses are planned for Tangerine Road and Silverbell Road within the Tucson-Tortolita Mountains wildlife linkage. Impacts to these wildlife linkages in particular must be fully analyzed and mitigated for in the EIS.

In general, severed wildland blocks create isolated wildlife populations, which then become more susceptible to extinction than connected populations. Connectivity is also necessary for wildlife to move across the landscape as they attempt to adapt to rapidly changing habitat conditions driven by climate change. Thus, the impact of a massive linear feature, such as a new highway severing any important movement area for wildlife, cannot be adequately mitigated off-site.

### ***Impacts to Pima County's Conservation Lands System***

The EIS must fully analyze direct, indirect and cumulative impacts to Pima County's Conservation Lands System, which is the foundation of the county's federal ITP. All possible alignments of Interstate 11 would impact lands identified in the Sonoran Desert Conservation Plan's Conservation Lands System (CLS). The CLS was first adopted in compliance with Arizona state law by Pima County in 2001 (and further amended in 2005) as a part of the Environmental Element of the County's required Comprehensive Land Use Plan. The County convened a Science Technical Advisory Team (STAT), comprised of members of the FWS, AzGFD, National Park Service, professional biologists and natural resource academics. The CLS consists of a STAT-driven, scientifically-based map and set of policy guidelines for Pima County's most biologically-rich lands. These lands include Important Riparian Areas (IRAs), Biological Core Areas, Multiple Use Management Areas, and Species Special Management Areas. Each land category has recommended open space guidelines that are applied when landowners request a rezoning or other discretionary action from the County.

The CLS is a cornerstone of the SDCP and has guided land use and conservation decisions in Pima County since its adoption. We reiterate that implementation of the CLS is a foundational piece of Pima County's federal ITP under Section 10 of the Endangered Species Act. Impacts to Pima County's SDCP and the CLS must be considered when analyzing any potential corridor alignments. All impacts to CLS acreage must be fully mitigated as close to the area of impact as possible, with habitat as good, or better, than that impacted.

### ***Impacts to Riparian Habitat***

The EIS must fully analyze direct, indirect and cumulative impacts to riparian habitat within the entire study area. Any potential Interstate 11 alignments, as demonstrated by the maps ADOT displayed at the public meetings, will undoubtedly destroy and/or degrade important, and increasingly rare, riparian habitat. Some 80% of vertebrate species in the arid southwest region are dependent on riparian areas for at least part of their life cycle; over half of these cannot survive without access to riparian areas (Noss and Peters 1995).

The Arizona Partners in Flight Bird Conservation Plan states:

"Riparian woodlands comprise a very limited geographical area that is entirely disproportionate to their landscape importance... and immense biological interest (Lowe and Brown 1973). It has been estimated that only 1% of the western United States historically constituted this habitat type, and that 95% of the historic total has been altered or destroyed in the past 100 years (Krueper 1993, 1996). Riparian woodlands are among the most severely threatened habitats within Arizona. Maintenance of existing patches of this habitat, and restoration of mature riparian deciduous forests, should be among the top conservation priorities in the state."<sup>2</sup>

---

<sup>2</sup> [http://www.azgfd.gov/pdfs/w\\_c/partners\\_flight/APIF%20Conservation%20Plan.1999.Final.pdf](http://www.azgfd.gov/pdfs/w_c/partners_flight/APIF%20Conservation%20Plan.1999.Final.pdf)

Riparian habitat is valued for its multiple benefits to people as well as wildlife; it protects the natural functions of the floodplains, provides shelter, food, and natural beauty, prevents erosion, protects water quality, and increases groundwater recharge. Riparian habitat contains higher water availability, vegetation density, and biological productivity. Pima County has developed riparian conservation guidelines that make every effort to protect, restore, and enhance on-site the structure and functions of the CLS's IRAs and other riparian systems. Off-site mitigation of riparian resources is a less favorable option and is constrained by the lack of riparian habitat available with which to mitigate. Every effort should be made to avoid, protect, restore, and enhance the structure and functions of riparian areas. The CLS set aside guideline for IRAs is 95% of any given area of impact.

### ***Impacts to at-risk species***

The EIS must fully analyze the direct, indirect and cumulative impacts to all species or species habitat present in the project area, and especially those classified as federally "endangered" or "threatened," those identified by the state of Arizona [HabiMap](#) as "species of conservation concern or species of economic and recreational importance," and those identified by Pima County and FWS as "vulnerable" under the SDCP. Some of these species include, but are not limited to:

- Aberts towhee
- Bell's vireo
- Western burrowing owl
- Cactus ferruginous pygmy-owl
- Western yellow-billed cuckoo
- Swainson's hawk
- Rufous-winged sparrow
- Giant spotted whiptail
- Pima pineapple cactus
- Nichol turk's head cactus
- California leaf-nosed bat
- Mexican long-tailed bat
- Pale Townsend's big-eared bat
- Lesser long-nosed bat
- Merriam's mouse
- Jaguar
- Ocelot

### ***Impacts from noise and light pollution***

The EIS must thoroughly analyze the direct, indirect and cumulative impacts of noise and light pollution from any proposed alignments on resident and migratory wildlife and the wildlife habitats and corridors they utilize. The EIS must also thoroughly analyze any direct, indirect and cumulative impacts to the integrity of the dark skies required for astronomical observatories

such as the two reflective telescopes of the MDM Observatory, the Mount Lemmon Observatory, the Kitt Peak National Observatory, the Steward Observatory, the Fred Lawrence Whipple Observatory, and the Massive Monolithic Telescope, from light pollution, both from vehicle headlights and from reasonably foreseeable future commercial and residential development.

### ***Broader Impacts***

Other factors that must be analyzed include how continued climate change will impact Arizona's water resources and projected population growth; public health implications; environmental impacts; and long-term impacts on local and regional land-use plans.

Finally, the EIS must fully analyze the broader impacts of all alternative alignments. For example, any Interstate 11 alignment through Avra Valley would dramatically increase accessibility and thus encourage commercial and residential development. Such exurban development would result in even more habitat fragmentation, cause local governments to incur large financial responsibilities for new infrastructure costs and maintenance, and force major changes to existing local and regional land-use and zoning designations. Existing land use plans have already identified areas most appropriate for growth as mandated by state law and any new transportation corridors should be appropriately sited within those existing identified growth areas.

Additionally, a cost-benefit analysis of alternative(s) double decking I-19 and/or I-10 should be included in the EIS. This approach could reduce the cost of ROW acquisition and potentially avoid any new impacts in the Avra Valley. However, there would be increased environmental impacts from further fragmentation of the Tucson-Tortolita Mountains wildlife linkage corridor, which could be mitigated by construction of a wildlife crossing structure over I-10, as was recently successfully done on SR 77. The feasibility of such a structure has previously been discussed and accepted in principle by Pima County's RTA Wildlife Linkages Working Group, ADOT, AZ State Land Department, AzGFD, Pima County, Town of Marana, Coalition representatives, and others.

**Regardless, in considering a proposed Interstate 11 alignment between Nogales and Wickenburg, we argue that improvements to existing transportation corridors and reducing congestion on existing highways in order to accommodate future traffic will best avoid and minimize environmental impacts. The Coalition questions the purpose and need for a new interstate between Nogales and Wickenburg at all.**

### ***2007 Pima County Resolution***

In 2007, the Pima County Board of Supervisors passed Resolution No. 2007-343 opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated." Additionally, the Board called for the expansion of "capacity along Interstate 10 for multiple modes of travel

including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.” We strongly concur with Pima County’s 2007 resolution (attached). Rather than investigating the potential for new transportation corridors in Pima County, we encourage all transportation planners to work to develop multi-modal transportation options within existing transportation corridors.

Thank you for the opportunity to provide scoping comments on the *Interstate 11 Tier 1 Environmental Impact Statement, Nogales to Wickenburg*. We look forward to your analysis and assessment and to commenting further in future phases of the process. If we can be of any assistance, please do not hesitate to contact us.

Sincerely,

*U I*  
[Redacted]  
[Redacted]

**RESOLUTION NO. 2007- 343**

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

WHEREAS, Pima County's landmark Sonoran Desert Conservation Plan identifies 55 rare local species of concern, whose areas of habitat and corridors between habitat areas already are under threat from development; and

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

WHEREAS, since 1974 Pima County has bought more than 45,000 acres of land and assumed grazing leases on 86,000 acres for open-space and wildlife habitat preservation, and to mitigate impacts from development; and

WHEREAS, Pima County updated its Riparian Mitigation Ordinance in 2005 to avoid and minimize impacts to riparian vegetation along local washes; and

WHEREAS, the Arizona Department of Transportation (ADOT) has undertaken the Interstate 10 Phoenix-Tucson Bypass Study to look at alternative routes for new controlled access highways that Interstate 10 cars and trucks could use to bypass the Tucson and Phoenix metropolitan areas; and

WHEREAS, the study has advanced to the point of identifying two alternative routes which impact Pima County; and

WHEREAS, each of the alternatives would degrade the Sonoran Desert, sever wildlife corridors identified by the ADOT-sponsored "Arizona Wildlife Linkages Assessment," impede washes, open new areas to intense residential and commercial development far from existing urban centers, and thus encourage more car and truck travel at time when global warming and air pollution are growing concerns; and

WHEREAS, one of the alternatives would traverse the San Pedro River Valley impacting both Cochise County and Pima County; and

WHEREAS, the San Pedro River and its valley constitute one of the most biologically diverse and important ecosystems in North America, which also serves as vitally important flyway for hundreds of unique migratory bird species and is a sensitive aquatic and terrestrial wildlife corridor; and



WHEREAS, there are more than 500 known archaeological sites in the San Pedro River Valley, some dating back as much as 12,000 years and some considered sacred to Native American people; and

WHEREAS, a second identified route runs through the Avra Valley, negatively impacting Tucson Mountain Park, Saguaro National Park, Ironwood National Monument, Bureau of Reclamation's Central Arizona Project Canal mitigation area, and important elements of the County's Sonoran Desert Conservation Plan by slicing through sensitive areas, severing linkages between important habitat areas, and disturbing an unknown number of archeological sites; and

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

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

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

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

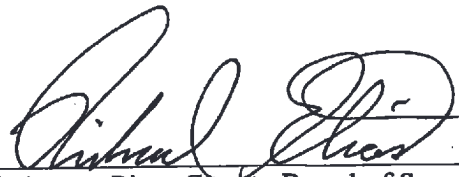
WHEREAS, the state of Arizona could reduce highway traffic congestion, reduce the cost of highway maintenance, and save on the costs of rights of way purchases and concrete and asphalt production and installation – while reducing air pollution and greenhouse gas emissions – by instead expanding capacity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

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

1. Opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archeological, and urban form impacts could not be adequately mitigated.

2. Supports the continuation of studies relating to this bypass such that the full costs of mitigation measures can be brought forth.
3. Calls upon the office of Governor Janet Napolitano to direct ADOT to undertake studies related to expanding capacity along Interstate 10 for multiple modes of travel including, but not limited to, freight, passenger cars, transit, intercity passenger rail, and bicycle, and for beautification of the existing corridor.

Passed by the Board of Supervisors of Pima County, this 18th day of December, 2007.



Chairman, Pima County Board of Supervisors

ATTEST:

APPROVED AS TO FORM:



Clerk of the Board



Deputy County Attorney

**From:** [REDACTED]  
**Sent:** Friday, July 08, 2016 8:57 AM  
**To:** I-11ADOTstudy  
**Subject:** scoping comments  
**Attachments:** scoping comments I-11 July 2015.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Attached.

[REDACTED]  
[REDACTED]

National Parks Conservation Association  
738 N. Fifth Ave., Suite 222  
Tucson, AZ 85705

[REDACTED]  
[REDACTED] [www.npca.org](http://www.npca.org)

***Educating, Engaging and Empowering national park advocates.***

Find Your Voice for national parks: [findyourvoice.camp](http://findyourvoice.camp) #FindYourVoice





**RE: NPCA scoping comments on the proposed Interstate 11 alignment through Avra Valley**

July 8, 2016

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

Also submitted by email: I-11ADOTStudy@hdrinc.com

To Whom This May Concern:

Thank you for this opportunity to participate in scoping as part of the environmental study for Interstate 11 (I-11) between Nogales and Wickenburg. These comments are submitted on behalf of National Parks Conservation Association (NPCA). NPCA was formed in 1919 to advocate on behalf of and in support of our national parks and has more than one million members and supporters.

These comments are limited to the potential for a preferred corridor for the Interstate being chosen during this Tier 1 NEPA process. In the enlarged study area going north and south through Pima County it is clear that there are two possible choices: improve the existing freeways to handle the increased load of creating an Interstate 11 route, or building a new freeway that would travel through the sparsely populated Avra Valley. We would think that the decision to choose between these two alternatives would require more in-depth analysis than is normally done during a Tier 1 phase, and ask that you do this analysis if you plan to make such a choice during this initial phase.

Our concern is that placing a multi-modal transportation corridor in Avra Valley would especially generate huge and unacceptable impacts to Saguaro National Park. We are also sympathetic to impacts to the world-famous Arizona-Sonora Desert Museum, Tucson Mountain Park, other protected federal lands, the rural character of this part of Pima County, the sovereign lands of the Tohono O'odham Nation. If the Avra Valley route is chosen, a simple statement that impacts would be mitigated would not be acceptable – each mitigation action contemplated must be examined for effectiveness, funding source, etc., and be subject to stakeholder and public review. This is the level of detail that I understand is typical for the next phase of NEPA analysis, and is the level of detail absolutely needed before a corridor selection is made.

Here are our concerns specific about an Avra Valley alignment. We urge you to consider the total impacts of what you are proposing, which would include at a minimum a freeway, but also opens the door for a transmission line, railroad, etc. You should of course include all the impacts that secondary development a freeway would encourage (gas stations, motels, fast food restaurants, etc.) in your analysis.

By the way, including a transmission line is odd in two ways. First, when transmission lines have been proposed in southern Arizona in the last couple of decades it was clearly decided not to route them along the existing freeways because we were told it would be too hard for maintenance or in case of disruption (if a line fell it would block freeway traffic, for instance). Second, there have been transmission line proposals recently that included a possible Avra Valley routing – but because of the complexity this location presented alternative routes were selected.

Our concerns with a potential Avra Valley Interstate 11 route:

1. The impact it would have on visitors' views from Saguaro National Park, the Arizona-Sonora Desert Museum, and Tucson Mountain Park.
2. The impact of noise it would generate on wildlife and visitors in Saguaro National Park, the Arizona-Sonora Desert Museum, and Tucson Mountain Park.
3. The added air pollution impacts. Saguaro National Park has a Class 1 designation under the Clean Air Act, and as it stands is not expected to meet future mandatory air quality goals (see [http://tucson.com/news/local/saguaro-national-park-ranks-th-on-list-of-most-polluted/article\\_25b239f4-3fb1-5e7d-adb5-699d7b01fb0a.html](http://tucson.com/news/local/saguaro-national-park-ranks-th-on-list-of-most-polluted/article_25b239f4-3fb1-5e7d-adb5-699d7b01fb0a.html) and <https://www.npca.org/resources/3137-polluted-parks-how-dirty-air-is-harming-america-s-national-parks>).
4. Impacts of light pollution would have on Saguaro National Park resources and visitors, on astronomy facilities in the region, and on migratory wildlife.
5. Impacts to the congressionally designated Saguaro Wilderness Area located in the park, especially to the wilderness values visitors to this area expect and deserve.
6. How increased production of pollutants from this project would contribute to climate change. If there is a per-mile algorithm that is typically used, this route would be more miles than improvement of existing freeways. The resulting development in this rural area would generate a lot more fossil fuel use.
7. While I earlier in this letter requested that you include the impacts that would occur from the development of support facilities (such as gas stations and fast food restaurants) and subdivisions that inevitably develop around new highway construction, this is a point I wish to make very strongly. If your plan is to place a highway in this sparsely developed area, impacts from such additional development needs to be included in your decision-making process.

By the way, it is deceiving and incorrect to advertise this process as one in which (quoting from your website and clearly announced in the public presentation I attended), “[t]he primary goal of the I-11 ASR and Tier 1 EIS is to reach consensus on a Selected Corridor Alternative.” NEPA is designed to help a federal agency make a good federal decision, and while the FHWA is posed to do a good job in involving stakeholders and the public in informing the decision, it is still a decision made by the agency and not by consensus. I currently serve on a Federal Advisory Committee to a Bureau of Recreation that operates by consensus, which works well for us as we are just developing recommendations. I seriously doubt that the FHWA is prepared to give its decision-making authority over to a group of transportation stakeholders in this matter (but if you do, I hereby volunteer for that committee). What I am really saying is that you shouldn’t use the word consensus unless you are committed to implement a process that is at least close to what is commonly considered consensus.

Again, we appreciate this opportunity to comment on scoping, and look forward to being involved in the NEPA process as it proceeds.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 10:27 PM  
**To:** I-11ADOTstudy  
**Subject:** Spare the rare desert wildlife

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern:

Not long ago two bighorn sheep were spotted in the Tucson Mountains. Biologists traced their tracks west across a break in the CAP canal that was designed and built for wildlife passage.

Now a proposed freeway, I-11, could keep them from returning—and threatens far more.

The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West.

Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.

I'm also concerned about impacts to federally and locally protected open space, including Ironwood Forest National Monument, Saguaro National Park, the Bureau of Reclamation's Central Arizona Project mitigation corridor, City of Tucson mitigation lands for their Avra Valley Habitat Conservation Plan, and Pima County mitigation lands for their Multi-Species Habitat Conservation Plan.

There is no need for a new freeway. I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. I'm in agreement with the 2007 Pima County Board of Supervisors Resolution opposing "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated."

Under the right circumstances, I could support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.

Thank you for your kind consideration,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Tuesday, July 05, 2016 7:16 PM  
**To:** I-11ADOTstudy  
**Subject:** study

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

ADOT. did have public hearing and did a environmental study on the transitional between interstate 8 and Highway 85.



**From:** [REDACTED]  
**Sent:** Wednesday, July 06, 2016 11:57 AM  
**To:** I-11ADOTstudy  
**Subject:** study

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

The environmental study and design and right of way for the transitional between I-8 and A 85 is less than five years old. The connection between I-8 business, Pima street, A 85 and A 238 was completed about 2 years ago. The transitional connection between I-8 and A 85 was put off to a later date, however the primary work was done.

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 2:40 PM  
**To:** I-11ADOTstudy  
**Cc:** [REDACTED]  
**Subject:** Subject: I oppose I-11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

---

Subject: I oppose I-11

---

To whom it may concern:

Not long ago two bighorn sheep were spotted in the Tucson Mountains. Biologists traced their tracks west across a break in the CAP canal that was designed and built for wildlife passage.

Now a proposed freeway, I-11, could keep them from returning—and threatens far more.

The proposed roadway will have severe and unrepairable impacts on wildlife connectivity between the Tumacacori Highlands and Santa Rita mountains—a known jaguar movement corridor—and surrounding Saguaro National Park West.

Wildlife corridors are becoming extremely scarce, and this proposed interstate project would impact the ability for wildlife to move as they need. Impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use are all of great concern as well.

I'm also concerned about impacts to federally and locally protected open space, including Ironwood Forest National Monument, Saguaro National Park, the Bureau of Reclamation's Central Arizona Project mitigation corridor, City of Tucson mitigation lands for their Avra Valley Habitat Conservation Plan, and Pima County mitigation lands for their Multi-Species Habitat Conservation Plan.

There is no need for a new freeway. I oppose the proposed I-11 highway bypass route through the Avra Valley, west of the Tucson Mountains. I'm in agreement with the 2007 Pima County Board of Supervisors Resolution opposing *"the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed the environmental, historic, archaeological, and urban form impacts could not be adequately mitigated."*

Under the right circumstances, I could support enhancing or expanding the existing I-10 and I-19 freeways to reduce congestion and accommodate future traffic volumes, while minimizing environmental impacts and maintaining the beauty and quality of life we enjoy in southern Arizona.

Thank you for your kind consideration,

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Saturday, May 28, 2016 1:09 PM  
**To:** I-11ADOTstudy  
**Subject:** Support for I-11

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To Whom It May Concern

Thank you for this opportunity to comment. SunFed is one of the larger firms in Santa Cruz County, employing in excess of 50 individuals and with annual sales projected at \$110,000,000 for this fiscal year. It is vitally important that SunFed and similar companies in Southern Arizona have the tools to succeed, as the Santa Cruz County unemployment rate habitually hovers in the double digits. Imported produce from Mexico, transported by truck to where consumers live, is the economic life's blood for Santy Cruz County commerce.

SunFed understands the importance in having infrastructure commensurate with the need to deliver our products to market. And we understand that we are already behind the curve in this matter, a reality we confront in the form of periodic late deliveries and increasingly expensive freight. A large part of our products are purchased by Canadian firms and our largest single customer is a Canadian Retailer. The development of I-11 would have a positive impact on our ability to service Western Canada, and, of course, points south. We see it as an indispensable requirement to advance a viable Interstate highway system in the Western US.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

**THE PERFECT MELONS YOU HAVE COME TO EXPECT  
PACKAGED IN A BRIGHT SUMMER BIN!**



**From:** [REDACTED]  
**Sent:** Thursday, June 02, 2016 5:07 AM  
**To:** I-11ADOTstudy  
**Subject:** To the Interstate 11 Tier 1 EIS Study Team

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**To the Interstate 11 Tier 1 EIS Study Team;**

I am against both of these proposed corridors for the following reasons. These proposed corridors parallel both I19 and I10. It appears to me the whole point of this study is to make the drive to Wickenburg easier. Looking at the map there are two bottle necks: Tucson and Phoenix.

Looking at the bottle neck at Phoenix, I favor the Eastern route. Since there is build-out from the highway, I would prefer to keep the highway from non-populated/sensitive areas. This would also provide those communities with an added source of income, and better access to goods.

Do we really need a highway that parallels I10? Since it has been build-out to six lanes. It is much more pleasant to drive on. Similarly, do we need a highway that parallels I19? I would be more in favor to buy the appropriate right-of-way to build-out another lane each way.

The last issue is the bottle neck in Tucson. Since we want to get to Wickenburg in the shortest amount of time/distance, I would prefer an interchange on I19 near Green Valley and another interchange I10 near Marana.

I believe these suggestions will keep the cost down and protect some of the sensitive areas this highway is proposed to traverse thorough.

Very Respectfully

[REDACTED]

## Mailed Comments

---

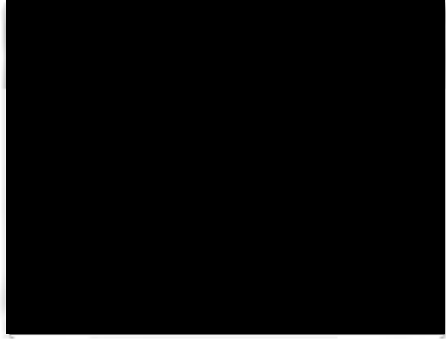
5-28-16



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

RE: INTERSTATE 11

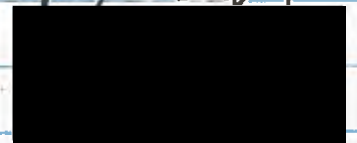
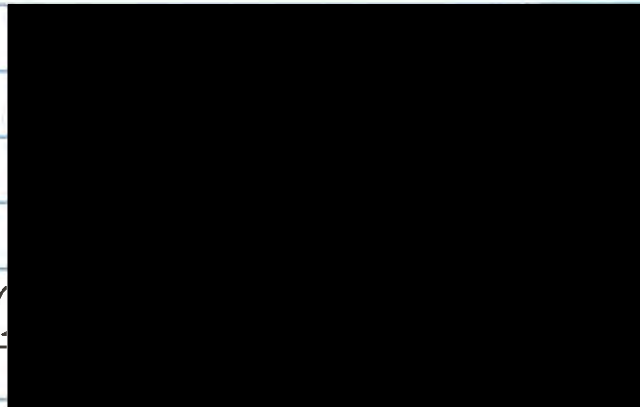
The proposal to build is completely unfathomable. Future generations will shake their heads in absolute disbelief that we allowed such incomprehensible damage to Arizona's environment.



30 May 16


NO! don't put I-11 thru Picture Rocks. It'll destroy the community. It will ruin everything out here that makes people live here. When you needed a place to put the CAP you put it out here. Now I-11. It's like we're seen as low-lives and no one will care what Tucson dumps on us. This is a beautiful area. Please don't put I-11 out here. I've lived out here since 1982 and I've no doubt your highway will destroy the area. If it is cheaper to stack I-11 on the existing freeway in Tucson I cannot understand why you want to build it out here and destroy all the desert - a national park no less. And what will it do to the wildlife? Can't be good. Please reconsider.

Sincerely,





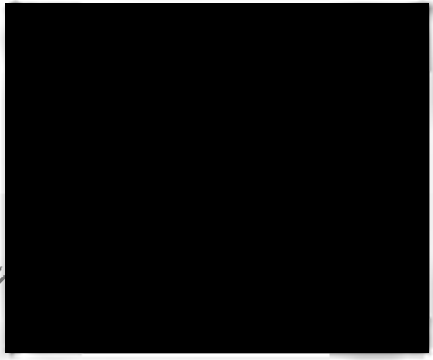
6-2-16



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

RE: INTERSTATE 11 HIGHWAY

As very concerned taxpayers and voters, please record our opposition to the planned Interstate 11 Highway for Southern Arizona. Please consider the rights of the citizens to protest.



June 6, 2016

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

Dear Study Team Leader:

For the past thirty years, **Archaeology Southwest**, a non-profit organization based in Tucson, has been dedicated to exploring and protecting the places of the past. Archaeology Southwest has practiced a holistic, conservation-based approach that we call Preservation Archaeology. By exploring what makes a place special, sharing this knowledge in innovative ways, and enacting flexible site protection strategies, we foster meaningful connections to the past and respectfully safeguard irreplaceable cultural resources. It is towards these ends that Archaeology Southwest submits the following comments in response to the Interstate 11 Corridor Tier 1 Environmental Impact Statement (EIS), Nogales to Wickenburg scoping.

As a preliminary matter, Archaeology Southwest urges Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHA) to initiate the Section 106 process immediately because the proposed Interstate 11 has the potential to adversely affect historic properties. *See* 36 C.F.R. § 800.1(c). Thorough and timely consultation with Native American tribes, state historic preservation officers (SHPOs), historic trail managers and non-governmental organizations, local communities and other interested parties must be a central component of the Section 106 process. Although FHA and ADOT can coordinate the requirements of Section 106 with the EIS process, *id.* § 800.8, the agency must provide advance notice to the Advisory Council on Historic Preservation (ACHP) and the SHPOs and meet explicit standards for coordination, which are spelled out in the Section 106 regulations, *id.* § 800.8(c)(1)(i)-(v). Archaeology Southwest respectfully requests to participate as consulting parties in the Section 106 process pursuant to *id.* §§ 800.2(c)(5), 800.3(f).

Through our experience working in the Southwest, it is evident that impacts to cultural resources in the central portion of Arizona have been severe as a result of attendant growth and development during the past 25 years. Major roads play a significant role in fostering these impacts not only from the direct effects of the roadway and its construction but the indirect and cumulative effects of the residential, commercial and industrial development that major roadways inevitably facilitate in many geographic areas. With this in mind, selection of alternatives should be designed to avoid significant cultural

resources and to consider both direct and indirect and cumulative effects of the alternatives under consideration.

Rather than rely solely on the known occurrence of historic properties which are eligible or potentially eligible for the National Register, it is essential that early planning incorporate landscape level planning for cultural resources. The importance of this has been highlighted recently by the Society of American Archaeology's online journal *Advances in Archaeological Practices Volume 4 Number 2* which is an outgrowth of the Society's three task forces on landscape scale cultural resource management. In particular we call attention to an article: *"Incorporating Archaeological Resources in Landscape Level Planning and Management"* (enclosed herein). The article describes three planning approaches that ensure historic resources receive serious attention in the early planning phases of projects when alternative development is under consideration.

With these recommendations in mind and at a minimum we strongly encourage your consideration of the cultural resource priority area information developed by Archaeology Southwest working with partners in a number of areas here in the Southwest. The methodology behind the development of this information is included in the attached article and we include specific spatial data (polygons and attribute files) for the identified priority areas within the I-11 Corridor Study Area (please note that priority area planning has not occurred in Santa Cruz County). Three of the priority areas are also National Register listed Historic Districts: Gunsight Mountain Archaeological District, Los Robles Archaeological District and Canoa Ranch Headquarters Historic District. There appears to be at least six National Historic Landmarks: Gatlin Site; Casa Grande Ruins National Monument; Mission Santos Angeles de Guevavi, San Xavier del Bac; San Cayetano de Calabasas; and Tumacacori Museum.

Another area of particular note is the area adjoining and including the Highway 80 crossing of the Gila River at Gillespie Dam Bridge. Dominated in part by a low shield volcano associated with the Sentinel-Arlington Volcanic Field, this area is known specifically in Pee-Posh as Chuk Shapijk ("Black Narrow Gap" and in O'odham as Vi Nyil Dukyeva ("Where the Black Mountains Come Together") and contains multiple significant archaeological and historical sites as well as serving as a traditional cultural property (Wright and Hopkins 2016<sup>1</sup>).

Both Gillespie Dam and the Gillespie Dam Bridge are significant historic sites, with the latter currently listed on the National Register of Historic Places for its unique architecture and engineering. Several other significant archaeological sites are found within one mile of this corridor. For instance, a large ancient village of mixed Hohokam and Patayan material culture is located just southeast of the Gillespie Dam. Known as the Gillespie Dam Site, AZ T:13:18 (ASM), the village is notable for its size, unique adobe architecture, and mixed cultural affiliation. Previous mitigation projects uncovered human remains, which triggered compliance under the Native American Grave Protection and Repatriation Act. This was the first instance in which Patayan remains were repatriated to affiliated tribes in southern Arizona. An unknown

---

<sup>1</sup> Wright, Aaron A. and Mariet Hopkins 2016. *Tribal Histories and Ties to the Great Bend of the Gila, Southwest Arizona*. Archaeology Southwest Technical Report, Tucson Arizona (manuscript in preparation).

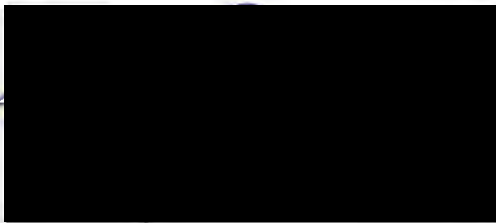
number of additional burials remain preserved at the Gillespie Dam Site. Upstream above the Dam is a Hohokam ballcourt village first identified by Gwynn Vivian in the mid-1960s.

Across the river from the Gillespie Dam Site is a cluster of several large concentrations of petroglyphs known as the Gillespie Dam Rock Art Complex. The size and extent of the Gillespie Dam Rock Art Complex has never been fully evaluated, but it is believed to be one of the largest concentrations of petroglyphs in the state of Arizona. The thousands of petroglyphs on the basalt escarpment overlook several Hohokam and Patayan habitation areas, one of which located on the Enterprise Ranch includes a ballcourt village site. Furthermore, the headgate of the precontact Enterprise Canal, which irrigated Hohokam fields for over 10 miles below the narrows is located just southwest of the Gillespie Dam. Each of the above-mentioned archaeological sites is eligible for listing on the National Register of Historic Places and we maintain that area from Power Butte to approximately one mile below the crossing is potentially eligible for listing on the National Register as an archaeological district and a cultural landscape and should be considered as such for purpose of the I-11 Tier I alternatives development.

We recognize that many considerations are at play in the development and selection of alternatives for a linear facility of this size. The priority area information submitted integrates known data with expert opinion to identify the most significant archaeological resources in the region, many of which are also traditional cultural properties. Avoidance of these areas in any alternatives design and selection would reflect significant consideration of cultural resources. Because of the density and significance of sites within these areas, avoidance of these areas has the added, likely benefit of reducing the costs of mitigation associated with potential effects on historic properties by directing effects to areas where density of significant of sites is reduced.

We look forward to our future participation in this project and your consideration of the information we have submitted.

Sincerely

A large black rectangular redaction box covering the signature of the Southwest Field representative.

Southwest Field representative

encl: Archaeology Southwest Priority Area Spatial Data  
SAA Online Journal Article Vol. 4 No 2.

# Incorporating Archaeological Resources in Landscape-Level Planning and Management

William H. Doelle, Pat Barker, David Cushman, Michael Heilen, Cynthia Herhahn,\* and Christina Rieth

In July 2015, the Bureau of Land Management (BLM) approached the Society for American Archaeology (SAA) about developing a discipline statement regarding the efficacy of incorporating archaeological resources in regional land-use plans (see Altschul 2016). The SAA established a task force charged with assessing the kinds of landscape-scale planning tools that exist for cultural resources and advancing recommendations about when and how to use them (See

Supplemental Appendix A). The BLM, like all federal land-managing agencies, is responding to increased development pressure on public and private land in the United States, while safeguarding cultural resources. The agency is shifting to landscape-scale approaches to land-use planning and to mitigation responses to impacts or threats to resources, spurred in part by the Secretary of the Interior's (Jewell 2013) department-level directive to take a landscape-level approach

## ABSTRACT

The increasing importance of landscape-scale research and preservation goals within the archaeological profession coincides with expanded threats to the archaeological record through massive energy exploration and infrastructure projects and through the cumulative effects of smaller-scale development. It is further stimulated by the recognition that conservation strategies that span multiple resource classes and disciplines are best formulated at multiple and larger spatial scales. These are key drivers behind efforts to improve the ways that archaeological resources are considered in the context of development-related planning and implementation, including mitigation measures. In a prominent example, recent department-level direction from the Secretary of the Interior calls specifically for landscape-level planning as a critical component of responses to both large-scale development and climate change. This article reviews three current approaches to landscape-level planning in archaeology and calls for increased commitment to advancing their development and effectiveness.

Dentro de la arqueología, la creciente importancia de investigaciones a nivel de paisaje y objetivos de conservación coincide con nuevas amenazas al registro arqueológico creadas tanto por proyectos de exploración e infraestructura para la generación masiva de energía como por los efectos cumulativos del desarrollo en pequeña escala. Ésta se estimula más al reconocer que las estrategias de conservación que abarcan varias disciplinas y categorías de recursos se formulan mejor en escalas espaciales múltiples y más grandes. Estos son factores impulsores claves en los esfuerzos por mejorar la consideración de los recursos arqueológicos en el contexto de la planificación y ejecución de los proyectos de desarrollo, incluyendo las medidas de mitigación. En un ejemplo destacado reciente, el Secretario del Interior exigió expresamente y a nivel de departamento la planificación a nivel de paisaje como componente crítico de las respuestas tanto al desarrollo en escala grande como al cambio climático. Este artículo revisa tres enfoques actuales para la planificación a nivel de paisaje en la arqueología y pide un mayor compromiso con fomentar su desarrollo y eficacia.

\*Cynthia L. Herhahn's affiliation is listed for identification purposes only. This article does not represent the views of the Bureau of Land Management.



when developing mitigation measures to address the increasing scale and intensity of development across the nation.

Current landscape-scale planning processes tend to be driven by biological and natural resource concerns (see resulting Energy and Climate Change Task Force Report by Clement et al. 2014), while cultural resource concerns are still being addressed largely on a site-specific scale. As a consequence, archaeological resources rarely receive serious attention in the initial stages of development projects when alternatives are under consideration. When addressed later, after critical decisions have been made regarding the selected alternative and even the precise configuration of the undertaking has been determined, archaeological management options are very limited. Minor design or implementation adjustments may allow for preservation through avoidance of some sites, but generally a data recovery and monitoring plan is formulated based on the outcome of a process that involved little direct archaeological input. The landscape-scale planning processes for cultural resources that are explored here are essential tools that we must understand and further develop if we are to bring relevant information to bear within regional planning processes by government agencies and within a variety of initiatives that fall outside of the National Historic Preservation Act (NHPA).

To understand why archaeological resources are treated differently from natural resources, we need to examine the process by which cultural resources, of which archaeological resources are a subset, are managed by federal agencies. Potential damage to cultural resources from land-use authorizations on federally managed land or from federally permitted or funded activities on nonfederal land is managed under Section 106 of the NHPA. Section 106 requires that federal agencies take into account the effects of their undertakings on cultural resources and afford the president's Advisory Council on Historic Preservation (ACHP) and the state historic preservation officer (SHPO) an opportunity to comment on these undertakings before they are implemented. Since the NHPA became law in 1966, implementing Section 106 has evolved through rule-making, congressional amendment, and judicial decisions into a relatively standardized and somewhat complex process. The way in which the NHPA is usually applied has led to an overemphasis on site-by-site evaluation at the expense of more regional approaches to historic preservation such as discussed here. Recent guidance issued by the ACHP and Council on Environmental Quality for the integration of Section 106 and National Environmental Policy Act (NEPA) review offers a framework within which cultural resource management may be undertaken on a regional scale and therefore be more meaningfully incorporated into regional land-use planning efforts.

In addition, there are activities that do not fall under NHPA that are considered here. For example, oil and gas exploration and extraction that is undertaken on private land and privately owned mineral rights commonly fall outside of NHPA. The effects of energy extraction on archaeological sites on private lands are generally not given the same consideration as the effects on sites on federal lands. Yet, industry and historic preservation groups would like to find some accommodation. As the Frack-Tracker Alliance (<http://www.fracktracker.org/2014/03/>

gapp/) notes: "There is, therefore, much to be gained by all stakeholders in generating a model that will help companies manage risk effectively and protect these [195,000 cultural, historic, and archaeological] sites with consistent, thoughtful approaches."

In short, there are multiple positive reasons to move the archaeological profession toward effective ways of being a part of a trend among federal agencies to promote landscape-scale approaches to their core land-management missions.

## WHAT IS A LANDSCAPE?

The definition of a landscape depends on who you ask. For a federal land manager, a landscape generally includes a relatively large area that has clear boundaries. Landscapes include not only multiple types of natural and cultural resources, but also many individual resources of each type. Landscapes often include lands managed by different federal, state, tribal, and municipal owners, as well as private property. They often are not "natural" units defined by physiography, hydrology, or vegetation, but instead are lands joined together by one or more land-use or management purposes. Rarely are cultural resources part of the decision to define a federally managed landscape.

A landscape can be many things to an archaeologist. Landscapes can be defined and investigated not only along ecological and environmental dimensions, but also along social, historical, and relational dimensions (Whittlesey 2004; Zedeño 1997, 2000). From a landscape perspective, these dimensions of landscape are intricately and holistically intertwined, historically contingent, and mutually causative (Barton et al. 2004; van der Leeuw and Redman 2002). Archaeologists increasingly look to landscape not simply as the environment where activities take place and with which people interact, but as a material medium for structuring and reproducing social relations and historical interactions (Hood 1996). From an archaeological perspective, landscapes are no longer viewed as the environmental backdrop of human activities, but the historical, cumulative result of people living in, adapting to, and manipulating the natural and built environment as well as interacting with each other. While people derive sustenance through technological and ecological interactions within landscapes, they also construct meaning and social memory through the experience and conceptualization of places and landmarks (Ingold 1993; Johnson 2012; Tilley 1994). As a result, social identity and history become embedded and materialized in landscapes, reflecting how people use and interact with the landscape. In this way, landscapes are culturally and historically constructed and are dynamic and changing (Bender 1993; Gailing and Leibenath 2015; Thomas 1996). Because of the distinctive technological, economic, political, and ideological ways that individual groups may interact with each other and their environment, the same physical parcel of land could contain remains from multiple past landscapes. In this sense, landscapes are in a constant state of becoming as they are used, transformed, or abandoned in the context of environmental and cultural change.

The archaeological literature on landscapes is far too immense to review here (see Anschütz et al. 2001; David and Thomas 2008; Fowles 2010; Wandsnider and Rossignol 1992). In this

paper, our main concern is with landscape in terms of geographical scale and as a unit of analysis, interpretation, and management. Managing at a landscape level requires an appreciation for issues of scale and units of analysis and the consideration of resource patterns and processes from multi-scalar perspectives. The social, temporal, and spatial scales at which landscapes are investigated depends on the processes and patterns that are of interest (Crumley and Marquardt 1990; Wandsnider 1998). Emically, spatial scale is socially constructed based on how social relations are expressed geographically and structured by social networks and characteristics of the landscape, including aspects of both the natural and built environment (Head 2008; Strang 2008). From an etic perspective, the spatial scale of a landscape is measured in both grain (size of smallest observation unit) and extent. When grain size decreases, the variance and detail of a landscape increases. When the spatial extent of a landscape is increased, broad-scale patterns can be observed with greater frequency and finer-scale patterns become more variable (Heilen et al. 2008; Wu and Qi 2000). Understanding both the broad-scale and fine-scale patterns provides for the development of more robust conservation strategies.

Archaeologists often think of landscapes as being substantially larger than individual sites or clusters of sites and smaller than a region. The scales at which archaeologists have investigated landscapes vary from tens to hundreds of thousands of square kilometers. For example, one might think of landscapes as encompassing the land and resources needed to support a particular community, ethnic group, population, or technological system. Ultimately, the scale and shape of a landscape is process- and problem-oriented. The size and configuration of a hunter-gatherer landscape for a pre-agricultural time period may be of a different size and shape than a later agricultural landscape. Thus, individual regional planning efforts in archaeology will likely have to consider multiple landscapes and may also need to consider, where possible, multiple spatial scales.

To some extent, our objective is to marry the management of current land use with ancient land use. To do so, we consider three current approaches to regional planning in archaeology. The approach with the longest developmental history within the discipline is predictive modeling, and it is addressed first. Two more recent developments are significance modeling and regional priority area planning. Each approach is briefly described and their particular contributions are considered.

A discussion of when and where these different approaches may be most appropriate for land-use planning is presented. In the final section, a set of desired outcomes is identified. In most cases, there will be several ways to advance toward those outcomes. Not surprisingly, it will often be the realities of development threats, funding availability, and/or the nature and number of involved land managers that will determine which options are feasible. As an online supplement, further consideration of land-use planning issues and links to several online examples of the different types of archaeological regional studies are provided (See Supplemental Appendix B).

## PREDICTIVE MODELING

Many archaeologists have expectations about where sites are likely to be located, based on behavioral inference, ethnographic analogy, regional culture history, and prior experience with archaeological survey and excavation. As such, archaeologists often have a model “in their heads” concerning the environmental settings where sites of different types are more or less likely to be located. Archaeological locational models leverage this professional insight and archaeological and environmental data in a systematic and replicable manner to predict the density and distribution of sites relative to environmental and/or cultural variables (Sebastian et al. 2005).

The theoretical underpinnings for locational models include cultural ecology (Steward 1938, 1955), site catchment analysis, and optimal-foraging theory (Bettinger 1991; Kelly 1995; Kohler 1988). Overall, such studies have shown that the range of possible group behavior in a given area was limited by local or regional environmental constraints in predictable ways and revealed statistical associations among site locations and environmental variables (Bettinger 1975, 1979, 1991; Plog and Hill 1971; Thomas 1971, 1972, 1973, 1983, 1988; Trigger 1989). Although early attempts at modeling found simple correlations among variables, they lacked a sound theoretical foundation. In the 1990s, optimal-foraging theory, landscape approaches, and other middle-range theories provided an improved theoretical basis for making and testing predictions about settlement and subsistence systems.

In recent decades, advances in geographical information systems (GIS) and relational databases allowed researchers and managers to map large numbers of sites against environmental zones in ways that facilitated regional resource planning (Kvamme 1989; Mehrer and Wescott 2006). Major improvements in statistical computing techniques and in the quality and availability of digital environmental data used in modeling have also led to substantial improvement in locational modeling. Now, it is possible to systematically model the density and distribution of archaeological sites across ecological zones in ways that can reliably quantify the likelihood of impacting significant cultural resources (Ingbar et al. 2000; Sebastian et al. 2005). Such models allow archaeological resources to be fully integrated in regional resource management planning and replicable and defensible choices among competing alternatives in environmental documentation and planning to be made.

## Predictive Model Building

There are many different ways to construct locational models, including both deductive and inductive approaches (Altschul 1988; Green et al. 2012; Ingbar et al. 2000; Kohler 1988; and Sebastian et al. 2005). The standard approach is to create a modeling dataset using a representative sample of sites and non-site locations derived from available survey data and a set of spatially explicit predictor variables representing environmental and/or cultural factors hypothesized to be associated with site location. Predictor variables are generally considered to serve as proxies for some of the major factors that influenced settlement decisions, such as the availability of arable soils or potable water. They often include soil types or attributes, plant communities, and variables related to topography and hydrology.

ogy, but may also include cultural variables such as proximity to roads or central places. The values of predictor variables are then analyzed and compared among sites and non-site locations to test for associations and to develop a series of expectations regarding the influence of predictor variables on site location. The art in selecting or developing predictor variables lies in having enough variation to produce large homogeneous stratification zones, while not having so much variation that sampling becomes an issue. Experimentation in creating or refining variables relevant to the specific historic and environmental context of the study area is often prudent and necessary. Care also needs to be taken in accounting for correlations between predictor variables that could influence modeling results.

Sample locations and predictor variables useful in distinguishing site and non-site locations are then used to develop a model. Sometimes, this is accomplished by weighting predictor variables and combining them using Boolean logic to derive a sensitivity map. More powerful approaches involve the use of multivariate statistics, such as logistic regression or classification and regression tree (CART) analysis. Such approaches can handle interactions among variables and calculate for each land parcel in a study area the probability that a site will be present, based on the values of multiple predictor variables (Green et al. 2012).

Locational models are typically depicted as a series of sensitivity zones indicating within a region of interest where sites are more or less likely to be located (e.g., low, moderate, and high sensitivity zones). Such maps allow researchers and managers to comprehend regional variation in archaeological sensitivity “at a glance” and can be readily used within a GIS to organize planning and research efforts according to sensitivity zone and other spatial parameters. In many cases, models are created to predict archaeological sensitivity for sites of any type, but some of the most effective models are those created for individual site types, such as those defined according to site function, period, and/or cultural affiliation (e.g., Heilen et al. 2013). For some contexts, it may also be important to predict the location of especially significant sites and/or sites that would likely require special consideration to mitigate (Altschul 1990). To do this, models are developed using site types that may be especially important or sensitive, such as large residential sites or sites with burials. Alternatively, models may be created using sites that fulfill particular NHPA significance criteria, such as modeling separately the location of sites that fulfill criterion D versus those that fulfill criteria A, B, or C. Since many models are based on data from surface or near-surface survey, it can be useful to combine a statistically derived locational model with a buried sites model. Such models use geoarchaeological information and an understanding of landscape-formation processes to identify where within a study area cultural deposits are likely to be buried. When operationalized in a GIS, individual site type models and buried site models can be readily integrated into a single planning model indicating where sites of different types are located as well as where sites are likely to be buried but may lack a surface component (Green et al. 2012).

## Predictive Model Performance

To gain stakeholder confidence, the performance of a locational model should be tested using data that are independent of those used to build the model. Often, testing data consist of an environmentally stratified random sample of available survey

data not used to build the model, but may also include new field data developed for test purposes. For example, a model can be refined with targeted field inventory, until there is a good fit among the expectations and available data and a planning model can be derived from the results.

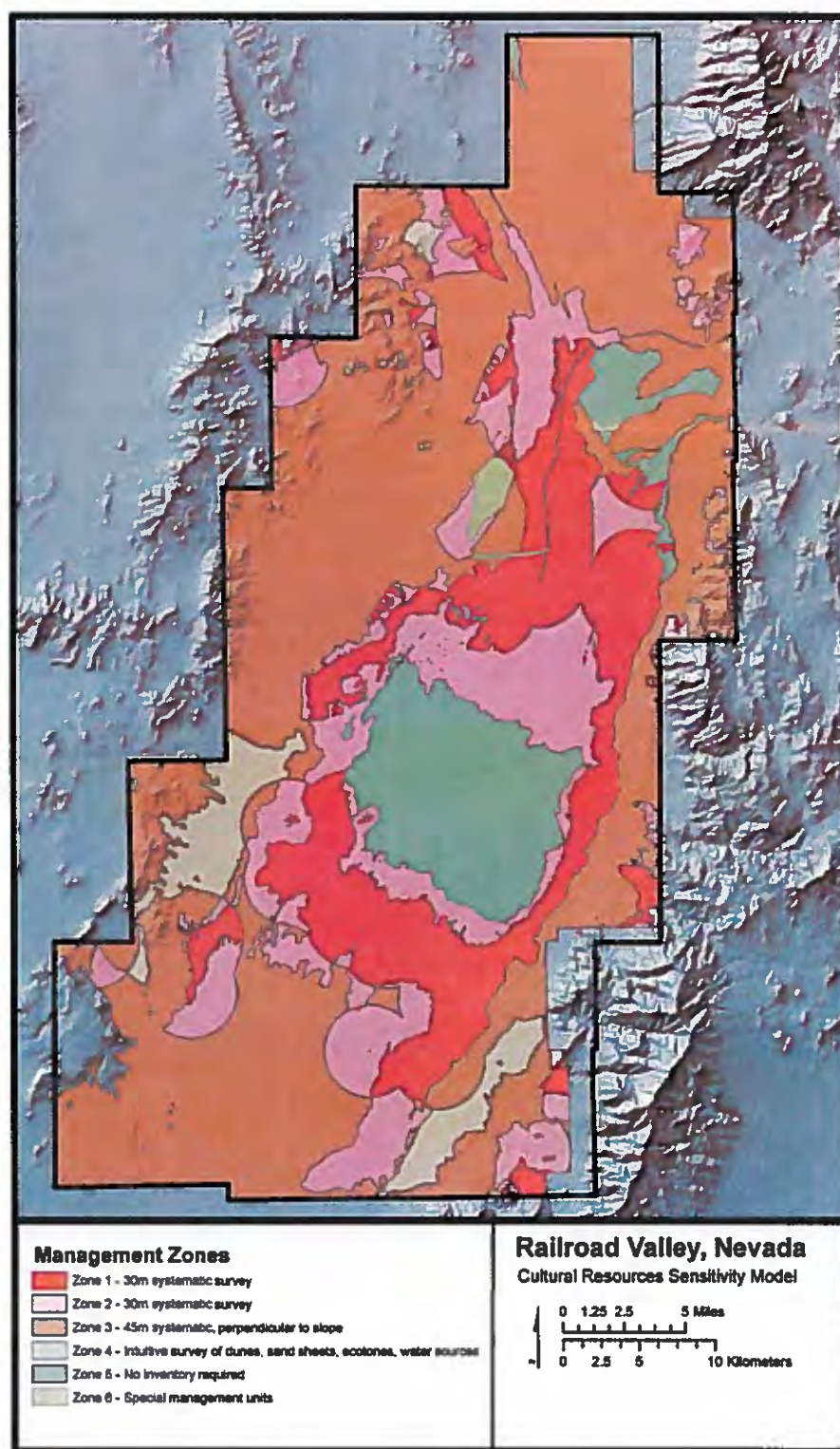
A variety of statistics have been developed to test model performance, including several designed specifically for assessing archaeological locational models: Gain, Gain Over Random, and Sensitivity Score (Altschul et al. 2004; Green et al. 2012; Kvamme 1988). Essentially, these statistics are used to quantify the proportion of sites or the site area that falls within each sensitivity zone, relative to the amount of area covered by the sensitivity zone. Overall, the goal in using such statistics is to maximize the proportion of sites found within moderate and high sensitivity zones while minimizing the area covered by those zones. For example, to implement a locational model developed for the state of Minnesota, stakeholders agreed that an acceptable level of performance would be achieved when 85 percent of sites were found within moderate and high sensitivity zones comprising no more than 33 percent of the study area (Hudak et al. 2002). While models with high prediction success are clearly the goal, useful information for planning purposes can be gained from models that still require additional refinement.

## Predictive Models in Action

A predictive model developed for Railroad Valley in east central Nevada (Ingbar et al. 2000) illustrates a combined payoff in terms of resource management practices by the BLM and compliance processes with small-scale oil and gas developers with federal leases. The model applies to roughly 2137 km<sup>2</sup> (825 mi<sup>2</sup>). It incorporates anthropological theory, a diversity of mapped environmental variables, and archaeological data from roughly 254 km<sup>2</sup> (98 mi<sup>2</sup>) of the study area that was previously surveyed. The predictive model process defined six management zones that have explicit archaeological compliance requirements prior to land development activities, primarily oil and gas development at present. These mapped zones in some cases have moderate to dramatic cost implications for archaeological compliance (Figure 1). One zone requires no inventory whatsoever, and two zones require reduced intensity of survey coverage. Together, these three zones of lower sensitivity comprise 65 percent of the area covered by the model. The other advantage to potential developers, even if the land they are interested in lies in the higher sensitivity zones, is that they have this information from the outset. They don’t have to await the outcome of a project-specific intensive survey to find out that they have leased themselves a major archaeological problem that will affect both their development costs and their schedule. BLM can use resource significance as a reliable variable in defining parcels for lease, and developers can balance costs and potential benefits as they evaluate whether to place a bid on a particular parcel. Ingbar et al. (2000:9) note:

The goal of the entire approach is to minimize the impacts to cultural resources through sound planning and management tools; this in turn lessens the collateral impact of cultural resources on fossil energy extraction. We think this is wise use of resources: cultural resources, natural resources, manpower, and capital.





**FIGURE 1.** Management zones defined for the Bureau of Land Management’s Railroad Valley cultural resource management plan in east-central Nevada. The valley has a large central playa, and habitat zones relate to elevation, water resources, and special conditions such as dunes. A predictive modeling study by Ingbar et al. (2000) combined environmental data with both anthropological models and existing data from previous archaeological surveys that covered 254 km<sup>2</sup> (98 mi<sup>2</sup>) of the 2551 km<sup>2</sup> (985 mi<sup>2</sup>) study area. They defined the six management zones shown here, and each zone has specific cultural resources inventory requirements prior to development activities. Zones 1 and 2 have standard systematic survey requirements, but Zones 3, 4, and 5 have a reduced level of effort for inventory [Courtesy of Gnomon, Inc.]

## Discussion: Predictive Planning Models

Current methods for inventory and evaluation often treat all areas as having an equal potential for containing archaeological sites, as if no knowledge exists regarding where sites tend to be located. Modeling leverages information about cultural resources that was collected at considerable cost to the American public and can be an important tool for considering the potential effects on cultural resources across broad planning areas, in addition to predicting the kinds of resources likely to occur where survey is absent or incomplete. Because models focus on prediction in ecological zones, data from all jurisdictions willing to share data (federal, tribal, state, local, and private) can be used to build the model. Models can also be used to measure the knowledge gained through additional survey efforts, helping managers decide how to best use scarce resources to identify and protect significant resources. In addition, such models provide a valuable tool for analyzing in a NEPA document the environmental consequences of different alternatives considered in a land-use plan, something that is nearly impossible without regional data.

Prior to predictive modeling, federal land-use plans usually included a discussion of the Section 106 process, a list of special management areas, if any, and possibly a list of known significant resources. Other than stating that archaeological resources will be managed according to the Section 106 process, plans may have included management prescriptions usually intended for interpretation of the most significant places. Land-use plans represent decisions about where and how land uses will be managed. If these basic decisions are made without appropriate consideration of archaeological resources, such as can be attained through the use of modeling, then managers are forced to rely exclusively on project-specific compliance processes, with all their inherent inefficiencies and uncertainty (Barker 2009).

Planning models provide empirically sound and legally defensible ways to justify cultural resource land-use restrictions in general land-use plans. By providing spatially explicit expectations regarding the nature and distribution of cultural resources according to transparent and replicable methods, decisions can be made consistently and reliably according to a programmatic approach (McManamon 2016). As such, compliance processes can move away from a reactive single site/single undertaking management and towards defensible and proactive adaptive management (Green et al. 2012). Ways in which predictive models can be translated into planning models are well described by Ebert (2001), Sullivan (2001, 2008), and Zeanah et al. (2004). With predictive planning models, individual undertakings in areas open to other land uses can still be subject to standard compliance processes; in limited areas, undertakings can be managed with predefined best management practices that are factored into undertaking budgets and timelines. There would be a basis for prescriptive land-use policies if the agency desired to exclude certain classes of activities in areas of known highly sensitive cultural resources, or at a minimum the cost implications of proposed development in such areas would be highlighted. Such decisions are best made within a consultative framework that makes the best use of available data, professional insight, and the limited resources available for research and management.

The acceptance and implementation of planning models is a social process that needs to take into account stakeholder concerns and perceptions regarding modeling. In the past, many researchers and managers have been cautious about applying models in their work, with some harboring a long-standing mistrust of models. As noted above, the data available for use in modeling are often far from perfect, leading to the concern that available data are inadequate to produce a reliable model. Predictions can be faulty, sometimes resulting in unforeseen impacts or project delays when too much reliance is placed on a model. There is also a common concern that modeling will be used as a substitute for inventory or that rare site types in anomalous locations will be missed. These concerns can be allayed by clearly explaining how a model was built and why; demonstrating the ways in which a model works well or does not; calculating the potential for error and communicating that potential clearly to stakeholders; developing agreements that stipulate periodic evaluation of model performance; updating models where appropriate with new data and professional insight; and working with stakeholders to decide on how a planning model can be used in making management decisions.

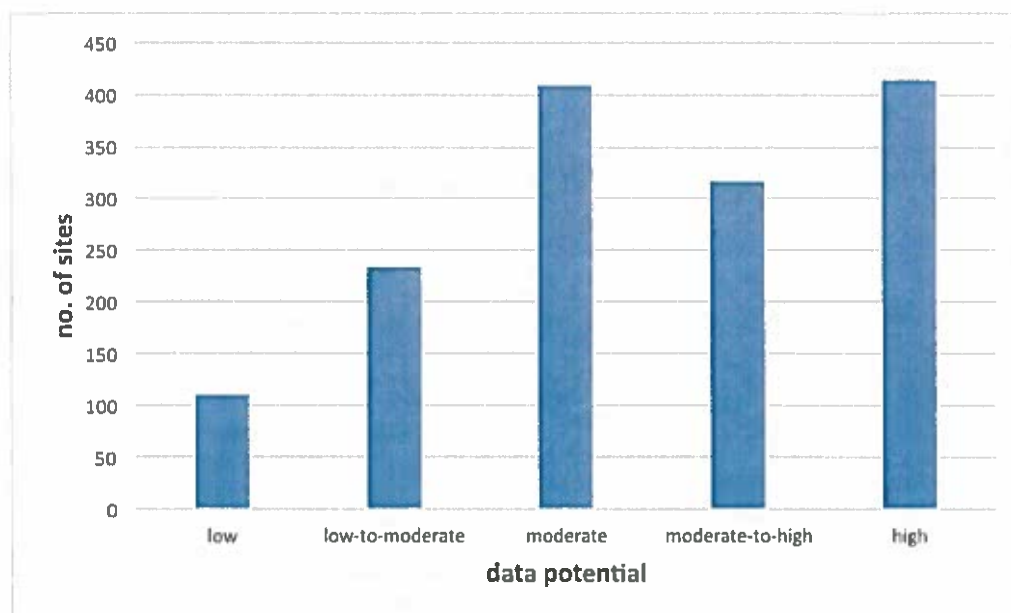
## SIGNIFICANCE MODELING

Issues related to the formal process of determining the significance of archaeological resources by applying National Register eligibility criteria are discussed elsewhere (McManamon et al. 2016; NRHP 1991; Sebastian et al. 2005). Significance modeling as discussed here refers to a suite of techniques for predicting the information potential and/or cultural sensitivity of sites using their recorded attributes. Common site attributes, such as site size, types and counts of artifacts, presence or absence of features, etc. can be used as proxies for inferring information potential and potential traditional cultural sensitivity. Using recorded characteristics, sites can be grouped into categories by period, type, and attribute or other characteristics to reflect different kinds of information potential and management implications. Sebastian (2009:100) suggests that these categories can include: sites whose information potential is so limited that the act of recording them exhausts their information potential; sites whose information potential cannot be captured with current research approaches and methods; sites that have information potential but whose current research potential has largely been exhausted by previous excavation of similar sites; sites likely to contribute significantly to current research questions and theoretical issues; and sites with high traditional cultural values as identified by descendant communities and other sources.

## Significance Models in Action

There is a variety of ways that significance models can be built. What is important is that the methods applied appropriately match how the archaeological record is conceptualized, interpreted, and managed and that the approach followed is transparent, objective, and replicable. For example, there may be particularly rare or important site types or periods, such as Paleoindian sites, that warrant their own category by virtue of their high research value. Alternatively, sites that are likely to be of high importance to Native Americans, such as sites with petroglyphs, could be categorized for special management purposes. Rule-based sorting algorithms are developed to





**FIGURE 2.** Significance modeling was applied to a sample of 1,500 of the several thousand sites on San Clemente Island, administered by the U.S. Navy. Sites were ranked according to data potential using algorithms that sorted sites into significance categories based on recorded site attributes.

assign sites into their respective categories and are based on the nature of the archaeological record of the region. These rules take the form of if/then statements, as in “if site has less than 100 artifacts and no features, then assign to category 1,” where category 1 is for sites with low information potential. For a site significance model developed for the White Sands Missile Base in New Mexico, physical data on over 3,400 archaeological sites representing 10,000 years of prehistory were sorted through three separate sorting stages, each with its own sorting rules, to create multiple categories reflecting different kinds of information potential for individual site components (Heilen et al. 2012). Since a majority of sites used in the study had not been evaluated for National Register eligibility, the installation can now make better and more informed decisions regarding the management of its archaeological resources.

Another significance model was recently developed for Navy Auxiliary Landing Field San Clemente Island (SCI), California, following an approach that replicates how the archaeological record is conceptualized and managed on the island, using multiple research proxies. At SCI, site density is very high, and thousands of sites have been recorded. The vast majority of sites consist primarily of a shell midden, many of which have similar characteristics when viewed from the surface. The research potential of these sites and their eligibility for listing on the NRHP under criterion D has for the past 25 years been evaluated based on four research proxies that correspond to specific kinds of information identified in SCI’s research design as being integral to answering research questions and addressing data gaps: debitage potential, formed artifact (tool) potential, marine shell potential, vertebrate faunal potential (Raab and Yatsko 1990, 2001). To evaluate a site’s eligibility, standardized testing procedures are used to estimate artifact and ecofact densities according to the above four proxies for research potential. If a

tested site exceeds a critical density threshold for one or more of the four research proxies, then the site is considered eligible. Based on this method, some 83 percent of tested sites at SCI are considered eligible under criterion D.

The significance model for SCI uses multiple categories of information derived from survey and site-recording efforts to individually predict debitage, formed artifact, marine shell, and vertebrate potential, using a series of sorting algorithms that place sites into categories of low, low-to-moderate, moderate, moderate-to-high, and high research potential (Heilen et al. 2015). Comparison of model predictions with the results of eligibility testing efforts suggests that the algorithms perform well in predicting research potential according to each of the four proxies. Individual research potential predictions were also combined to develop an overall data potential score that ranges from 1 to 5, with 1 being very low overall information potential and 5 being very high overall information potential (Figure 2). For the first time, the model allows managers to view research potential along a graded continuum and to predict the kinds and degree of research potential for thousands of sites with broadly similar characteristics. Importantly, the model shows that, while relatively small percentages of sites have either very low or very high research potential, most sites fall between these extremes. Moreover, spatial analysis of model results shows that sites tend to cluster spatially according to research potential. These clusters could be used to select samples of sites for testing, identify priority areas, create archaeological reserves and preserves, and develop creative mitigation approaches. The Navy is currently considering how to best use the model predictions as part of a programmatic agreement that specifies how the model should be used to make planning and management decisions.

## Discussion: Significance Models

There are a number of advantages to significance modeling. Significance models:

- leverage available data to provide a proactive, transparent approach to evaluating information potential and cultural sensitivity;
- can be tailored to meet a variety of research and management objectives
- can be refined over time to reflect changing management priorities and research agendas
- promote attention to properties of high cultural significance to tribes and descendant communities, rather than focusing primarily on the information potential of a property.

A criticism of the National Register evaluation process is that it forces the user to consider only our current understandings about the past. With a significance modeling approach, land managing agencies can set aside a sample of sites that may yield important information in the future when new questions arise and new investigative technologies are available (Sebastian 2009). Special consideration can be given to sites of high traditional cultural significance, such as the establishment of preserves. Sites can also be formally evaluated, as necessary, according to a sampling approach that focuses on site types and significance categories and also contributes to model refinement.

Modeling site significance has its limits. It requires enough information of sufficient detail to allow categorization and the data must be available in a computerized database. The modeling is best achieved in places where the archaeological record is well-known and well-described. An understanding of the relationship between surface and subsurface contexts is also important, as is an appropriate sample of tested or excavated sites that can be used to test model predictions. The significance categories may require field verification through archaeological testing to establish the relationship between surface and subsurface context, where that relationship is unclear. Lastly, site significance modeling requires a proactive approach to managing archaeological sites and may be more suitable to land managing agencies that have control over and responsibility for their resources.

## EXPERT-INFORMED PRIORITY AREA PLANNING

A third approach to regional modeling involves expert-informed planning. Archaeologists and other cultural resource professionals represent a high-value source of information about the archaeological record. These are the people who know the sites and can assist planners and resource managers to organize site data, assign value, and identify management priorities.

### The Elements of Priority Area Planning

Recent efforts in Arizona and New Mexico have convened groups of cultural resource experts with local knowledge in order to identify specific high-priority areas for consideration in long-term preservation plans (Cushman 2002; Laurenzi 2012; Laurenzi et al. 2013). The methods include five basic elements

described by Laurenzi et al. (2013:63): "geospatial data organization within a defined area (typically watersheds), expert opinion, field assessments, more detailed site survey information (when available), and land ownership records review." Each of these elements is briefly discussed.

**Geospatial Data Organization.** Many states have digital databases that are the official or primary inventories for the archaeological resources of the entire state. Other databases also exist for lands administered by other government agencies. Many of these databases began as or were transitioned to geodatabases. Experience in the Southwest has shown that these administrative databases, even if their data are georeferenced, contain large numbers of sites with "low information content," sometimes due to insufficient data recording in the distant past, sometimes because they represent marginal resources, and sometimes both (see Wilshusen et al. 2016). Thus, a significant initial effort in assembling geospatial data within a study area involves informal discussion with experts to identify types of sites and features they see as important. This discussion leads to the development of an explicit set of criteria to winnow large databases into greatly reduced geospatial datasets comprised of "focal sites" that are the basis for subsequent planning. For example, site types such as "habitation, cave/rockshelter, petroglyph, or pictograph" were deemed of interest. The category "habitation" was further sorted according to presence of 10 or more pithouses or 12 or more adobe or masonry rooms. Further, Laurenzi et al. (2013) suggest that leveraging research databases compiled for other studies (e.g., regional compilations of large sites or sites of certain categories) can prove useful in such priority-setting exercises. Indeed, in an ideal world, such priority setting efforts can both inform and be responsive to ongoing programs of regional scale research (Peeples et al. 2016).

**Expert Opinion.** An essential element of this process is to solicit the direct input of as many experts as possible in a workshop framework. Experts generally include professional archaeologists, tribal representatives, and other heritage management specialists. Displaying the focal sites and their distribution on a base map projected on a large screen allows the entire group of experts to engage in direct discussion of what is known about focal sites, their relationships in time and space to other sites, and their significance, integrity, representativeness, and uniqueness. In the workshop context, polygons are drawn around areas that experts consider to be priority areas. Specific statements by the experts are also attached to individual priority areas as part of the documentation process in the workshop. For identified experts who were not able to participate directly in the workshop, arrangements were made for follow-up interviews, sometimes by phone but preferably in person. The outcome of the solicitation of expert opinion is a map of priority areas that is ready for further refinement through three more steps.

**Additional Site Survey Information.** Because focal sites are a subset of the total site universe currently known, there often is additional information on sites in the vicinity of expert-defined priority areas. This information is reviewed and helps to refine the boundaries of many areas. In addition, information on site condition is sometimes available.

**Field Assessment.** Where feasible, field visits are made to evaluate the location and current condition of sites within priority

areas. If direct access is not possible, then recent development or land modifications are assessed by examining the latest imagery available via Google Earth or other landscape imaging sources.

**Land Ownership Records.** The final factor considered in creating priority area boundaries is land ownership. Rather than the irregular polygons established in the workshops, the goal is to create polygons that conform to the half-section (half-mile) land subdivisions, so that the sensitive areas are generalized and can be shared with public audiences. In addition, as Laurenzi et al. (2014:66) note: "In general, we sought to minimize the inclusion of private property where preservation targets were not located on private holdings. Private property rights are a sensitive issue and merit careful consideration in the priority setting process."

## Priority Area Planning in Action

Eight examples of completed planning projects illustrate the flexible nature of defining study areas. One employed a hydrologically defined river valley, two were defined as major portions of an Arizona county, four were portions of watersheds and comprised culture-historical units of relevance to archaeologists, and one focused on a particular past cultural unit and limited time period. The upper limit to the size of such a planning area is constrained by general factors, such as the effort required to assemble geospatial data, the number of available experts and the spatial extent of their knowledge, available time and funding, and specific goals of a particular planning effort. Figure 3 shows the spatial coverage of the eight such projects undertaken to date, and they cover roughly half of the spatial extent of the U.S. Southwest.

Pima County, in south-central Arizona, developed the first such priority area plan (Cushman 2002), and it has guided the county's selection of archaeological sites for purchases using voter-approved bond funds. To date, they have purchased major portions of four Hohokam ball court villages for long-term preservation and interpretation. This cultural resources effort is part of a larger Sonoran Desert Conservation Plan developed by Pima County that includes open-space acquisition and ranch conservation elements that provide additional protections for archaeological resources. Archaeology Southwest, a private nonprofit organization, led the development of the other seven plans. The priorities identified serve to guide the organization's efforts to establish conservation easements or to gain fee ownership of priority archaeological properties in private ownership. Archaeology Southwest has become a formal "Consulting Party" on several major federal undertakings. In such cases, the formally prepared plan provided a basis for communicating a professional consensus regarding cultural resource priority areas and provided planning information of relevance to the agency at the initial stages of their large-scale land modification project.

## Discussion: Expert-Informed Priority Area Planning

Expert-informed priority area planning identifies spatially explicit areas that complement assessments of individual site eligibility for purposes of listing on the National Register by providing an added layer of regionally contextualized information at larger geographic scales. While users of the information should

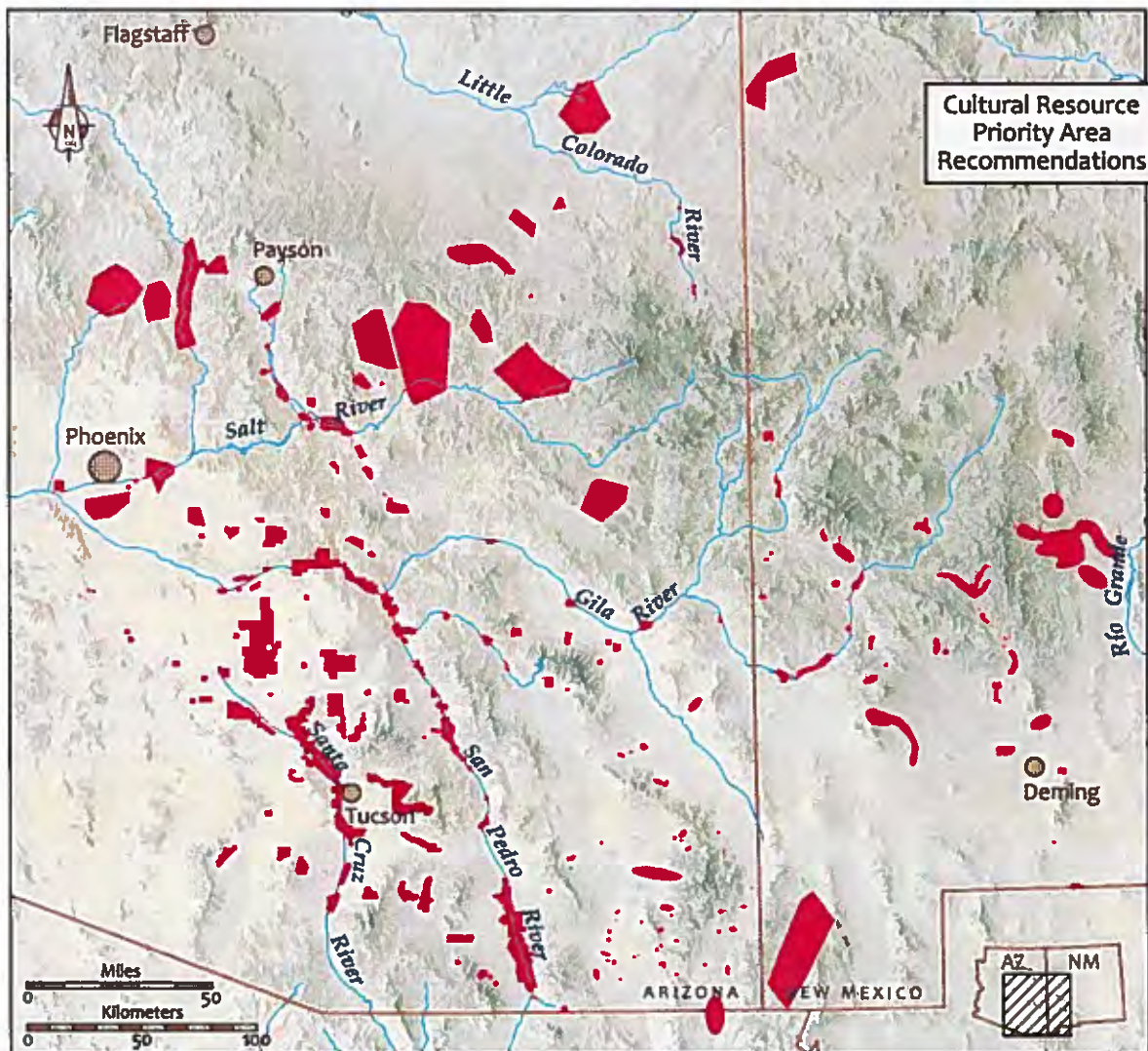
acknowledge that boundaries are abstractions based on current knowledge and, in some instances, land ownership, they nonetheless provide a means of organizing site information to allow for consideration of cultural resources at landscape scales. The identification of areas where high-value cultural resources are clustered provides the land management agency with a mechanism to better contextualize cultural resources for purposes of "planning across landscapes and at multiple scales," as called for in BLM Planning 2.0 ([www.blm.gov/plan2](http://www.blm.gov/plan2)). This is similar to the concept of "biodiversity hotspots" often employed in natural resource planning efforts. Priority area identification can also inform special management area designations, both administrative and legislative. This information enables better coordination between agencies to define and achieve shared planning priorities, thus maximizing the use of limited time and financial resources. Principles of adaptive planning can be employed, resulting in better preservation outcomes over time. By focusing on site clusters and areas with substantial time depth of past use, the priority planning process often identifies areas with other resource values. For example, springs, perennial streams, and mountain settings often have high value for recreation and wildlife. Thus, protection priorities for multiple resources often come together.

Similarly, this approach allows for earlier and more substantive consideration of cultural resources in project planning efforts that occur at larger scales where Class III survey information is unlikely to occur until project location and, in some instances, design are fixed. A case in point is a recent BLM transmission line planning effort in Arizona and New Mexico that, at early stages, examined multiple alignments and sub-alignments. Avoidance of priority areas becomes one consideration in the alignment selection process and allows for robust comparison of alignments as they pertain to cultural resource impacts. At present, such projects invest less effort to avoid cultural resources relative to ecological resource values (and even less to avoid indirect effects) and address them as a mitigation cost.

Experts play a strong role in this process, which has several positive aspects. Application of this process to date has shown that it has been relatively quick and easy for experts to come to agreement on which known resources should be considered high-priority resources for preservation planning. Because the amount of time that each expert needs to contribute to the overall process is rarely more than a single day and often less, the process is relatively inexpensive to implement. Data coverage is frequently uneven and, in some instances, expert perspective can account for data shortcomings. It has been noted that the information that guides the opinions of the experts is often unique to them and many times is not adequately recorded. Thus, this process helps to preserve the knowledge of our experts.

However, for the most part, expert opinion is well-grounded in the geospatial data. While tribal experts have attended multiple priority area planning sessions, efforts to date have not attempted to map tribal concerns such as traditional cultural properties (where they do not intersect with archaeological resources). Given that tribal participants could bring the relevant expertise to this process, there is no reason to doubt that such resources could be incorporated into the priority area planning process.





**FIGURE 3.** Cultural Resource Priority Areas defined for seven completed planning units within Arizona and New Mexico based on meetings with experts and site data from the Heritage Southwest database maintained by Archaeology Southwest. Criteria varied slightly by planning unit, but the kinds of focal sites considered in the initial meetings were habitation sites (especially with special attributes such as ball courts, platform mounds, kivas, or reservoirs), larger petroglyph or pictograph sites, and caves or rock shelters with cultural deposits.

## DISCUSSION OF PLANNING ISSUES

This paper has identified current practices in use by cultural resource professionals for regional-scale planning. The nature of the methods has been considered, and some common impediments to implementation and some common strengths were noted. An important principle employed by the authors and that we underscore here is that an invaluable resource in the regional planning effort is the knowledge of existing archaeological experts. The growth of the discipline has greatly expanded the numbers of individuals with practical field experience and with specialized skills in regional analysis. The systematic tapping of that knowledge in group settings can elicit and document substantial amounts of regional information on priority resource

areas. In addition, specialization within the larger pool of professional archaeologists has led to the development of experts' skills in ever more powerful geospatial and statistical tools. This is another invaluable form of professional expertise.

Brief consideration is given to some core issues that affect how regional assessment of archaeological resources is accomplished under the three approaches reviewed above.

### Data

Each of the approaches we highlight here have elements in common that are key to their success, or could cause them to fall short. The most obvious and important is the quality of the existing archaeological site inventory. For many land-managing agencies, only a small proportion of land area has been

surveyed for archaeological resources. Moreover, vast areas of private land potentially affected by development projects have been subject to limited or no survey. The better the quality and the currency of the archaeological survey information, the greater the potential for success—for all approaches. When the data are in a well-designed and well-maintained geodatabase, potential for success is further increased. There is broad agreement that the initial cost of developing a high-quality geodatabase is often a challenge. However, once such a geodatabase is established, the value of maintaining it and using it to improve the quality of archaeological management and planning is obvious and hopefully will be effectively implemented in most, if not all, cases. Further, it can often be useful to take advantage of existing research database resources compiled for other purposes.

## Significance

For planning studies, which must consider both present and future conditions, it is useful to adopt a more flexible view of significance than the binary view of the National Register eligibility criteria. Sebastian (2009) argues that all archaeological resources have information potential on a sliding scale from low to high. All three approaches, alone or in combination, provide information regarding resource significance that is useful in making planning decisions. In general, predictive modeling can generate zones of high, moderate, or low sensitivity that reflect multiple factors related to the significance of the resources expected within those zones. Significance modeling employs explicit algorithms to assess significance for large numbers of resources within a study area. Priority area planning employs expert opinion to identify consensus areas of high information value or other values such as cultural values. In these ways, all three approaches can provide relevant information for land-use planning on regional scales.

## Study Area Size

There is no single factor determining study area size for any of these regional approaches. In fact, flexibility of study area size is notable for the different approaches. Areas do need to be sufficiently homogeneous environmentally and culturally to allow reliable and meaningful predictions to be made. Considerations of archaeological theory are often part of the process. For example, hunter-gatherer adaptations and settled agriculturalist adaptations imply different decision-making processes, and modeling their past behaviors is best considered separately. It may be necessary to consider multiple landscapes for a study area when time is factored in. Finally, all approaches can incorporate information about where in a study area information is insufficient for making reliable predictions.

## Land Management Status

Areas with a single or very few land managers provide better conditions for planning studies. Agencies that manage larger land areas are likely to undertake integrated planning studies and to develop land-use management plans and protocols. The reality, however, is that much of the nation is highly fragmented in terms of land ownership and land management. As a result, partnerships between federal agencies (e.g., BLM and Forest Service) or regional (e.g., Metropolitan Planning Organizations) or state-level agencies (e.g., SHPOs or state departments of

transportation) are likely to be logical coordinators of larger-scale planning studies. Private conservation organizations or industry-focused groups such as the Leaders in Energy and Preservation partnership, known as LEAP ([www.gasandpreservation.org](http://www.gasandpreservation.org)), can also be factors in overcoming fragmented land-management impediments to regional planning.

## Potential to Combine Methods

As these different approaches were being described and discussed, the potential to combine the methods, or at least aspects of them became increasingly apparent. For example, the significance modeling approach could be applied as a more rigorous and explicit way of defining the focal sites employed in the priority area planning process. Similarly, predictive models could help to identify potential priority areas within zones where only limited previous survey had been conducted. Alternatively, if sufficient numbers of focal sites exist, then a focal site sensitivity map could be created, which in turn could then be a point of departure for discussion. It is clear that there is significant potential for cross-fertilization between these approaches.

# CONCLUSIONS AND RECOMMENDATIONS

In this final section, we briefly address the issue of how to move these archaeological planning tools into an active presence in the regional land-use planning process. The focus is on identifying a pragmatic and flexible set of options that provide high-quality cultural resource data on a regional scale to affirmatively guide planning efforts for development projects, as well as general land-use plans. This goal places a premium on timely assessment of current data so that the data are available in a form that is relevant to planners. The following principles and practices will provide information of direct value to regional planning efforts:

- Priority resource areas, high-sensitivity resource zones, or a combination of the two must be identified and should be clearly identified as areas to avoid or as areas for which special considerations need to be made in permitting specific land uses. Ideally, this would be done at the land-use planning stage (e.g., BLM's Resource Management Plans, U.S. Forest Service Forest Plans, NPS General Management Plans), but would also be useful in travel management plans (e.g., BLM or Forest Service plans that designate roads and trails and specify authorized uses), and large-scale project-specific plans.
- It is highly desirable that low-sensitivity resource zones be defined with a clear statement that such zones are preferred for any land use because the impact on cultural resources would be far less than in other sensitivity zones.
- Information about priority planning areas and sensitivity zones must be publicly available for planners. The information will be conveyed as spatially aggregated priority areas or sensitivity zones, which are not the boundaries of single archaeological resources.
- Modeling should be viewed as a process. Models and priority planning areas should be periodically evaluated.



and updated to incorporate new methods and information about the distribution of significant resources or changes in land use that may have altered the condition of significant resources, rendering them no longer significant.

- Wherever possible, regional planning efforts for heritage resources should take advantage of existing regional planning efforts that address natural and biological resources or partner with teams undertaking such planning. Working with the state departments of transportation and Metropolitan Planning Organizations through their transportation planning processes is an example.
- Continued involvement of the SAA in this process is essential. Engagement in advocacy is an essential function of the nation's primary professional organization for archaeologists.

The most effective way to achieve these goals will vary geographically, based on the state of current knowledge, the availability and quality of cultural resource databases, the varying patterns of land ownership and land management across the nation, and the level of development threats to the cultural resources of the region. Perhaps most challenging is the issue of securing the funding to advance the above goals. Partnerships with large land-managing agencies or with state-level agencies (e.g. SHPOs or State Archaeologists) who maintain state-level cultural resource databases are likely one promising avenue. In some cases, large land managers will contract for regional plans, but, for much of the nation's land base, a single large land manager is not a reality.

To close, archaeologists have an opportunity to be "at the table" as the nation's land managers transform the ways in which they implement their obligations to manage cultural resources on federal lands and to address the compliance requirements of major (as well as numerous lesser) land modification undertakings. Archaeological modeling approaches have been under development for several decades. It is notable that the modeled environments, significance assessments, and priority areas considered here are based on large regional samples of sites, rather than on viewing each archaeological site independently. That is a critical conceptual step in transforming the ways that land managers shift to landscape-scale thinking. It is time for the archaeological profession to focus on sharing its current approaches with federal planners and land managers and for archaeologists to engage both with each other and with the diverse agencies to further advance the utility of these tools for landscape-scale planning and management.

## Data Availability Statement

No data were used in preparing this manuscript. References are to other previously published examples.

## Supplemental Materials

Supplemental materials are accessible via the SAA member login at [www.saa.org/members-login](http://www.saa.org/members-login):

Supplemental Appendix A: Task Force on Incorporating Archaeological Resources in Regional Land-Use Plans

Supplemental Appendix B: Example Applications of Archaeological Planning Tools

## REFERENCES CITED

- Altschul, Jeffrey H.  
1988 Models and the Modeling Process. In *Quantifying the Past and Predicting the Past: Theory, Method, and Application of Archaeological Predictive Modeling*, edited by W. James Judge and Lynne Sebastian, pp. 61–96. USDI Bureau of Land Management, Denver, Colorado.
- 1990 Red Flag Models: The Use of Modeling in Management Contexts. In *Interpreting Space: GIS and Archaeology*, edited by Kathleen M. S. Allen, Stanton W. Green, and Ezra B. W. Zubrow, pp. 226–238. Taylor and Francis, London, England.
- 2016 The Society for American Archaeology's Task Forces on Landscape Policy Issues. *Advances in Archaeological Practice* 4(2):102–105.
- Altschul, Jeffrey H., Lynne Sebastian, and Kurt Heidelberg  
2004 *Predictive Modeling in the Military: Similar Goals, Divergent Paths*. Legacy Resource Management Program Project No. 03-167. Preservation Research Series 1. SRI Foundation, Rio Rancho, New Mexico.
- Anschütz, Kurt F., Richard H. Wilshusen, and Cherie L. Scheick  
2001 An Archaeology of Landscapes: Perspectives and Directions. *Journal of Archaeological Research* 9(2):157–211.
- Barker, Pat  
2009 The Process Made Me Do It: Or Would a Reasonably Intelligent Person Agree that CRM Is Reasonably Intelligent? In *Archaeology and Public Policy: New Visions for the Future*, edited by Lynne Sebastian and William Lipe, pp. 65–90. School for Advanced Research, Santa Fe, New Mexico.
- Barton, C. M., Joan Bernabeu, J. Emili Aura, Oreta Garcia, Steven Schmich, and Lluís Molina  
2004 Long-Term Socioecology and Contingent Landscapes. *Journal of Archaeological Method and Theory* 11(3):253–295.
- Bender, Barbara (editor)  
1993 *Landscape: Politics and Perspectives*. Berg, London.
- Bettinger, Robert L.  
1975 *The Surface Archaeology of Owens Valley, Eastern California: Prehistoric Man-land Relationships in the Great Basin*. Ph.D. dissertation, Department of Anthropology, University of California, Riverside.
- 1979 Multivariate Statistical Analysis of a Regional Subsistence Model for Owens Valley. *American Antiquity* 44(3):455–470.
- 1991 *Hunter-Gatherers: Archaeological and Evolutionary Theory*. Plenum Press, New York.
- Clement, Joel P., Alletta d'A. Belin, Michael J. Bean, Ted A. Boling, and James R. Lyons  
2014 *A Strategy for Improving the Mitigation Policies and Practices of the Department of Interior: A Report to the Secretary of the Interior from the Energy and Climate Change Task Force*. Washington, D.C. Electronic document, [www.doe.gov/new/upload/Mitigation-Report-to-the-Secretary\\_04\\_08\\_14\\_FINAL.pdf](http://www.doe.gov/new/upload/Mitigation-Report-to-the-Secretary_04_08_14_FINAL.pdf), accessed March 12, 2016.
- Crumley, Carole, and William H. Marquardt  
1990 Landscape: A Unifying Concept in Regional Analysis. In *Interpreting Space: GIS and Archaeology*, edited by Kathleen Allen, Stanton Green, and Ezra Zubrow, pp. 73–79. Taylor and Francis, London.
- Cushman, David  
2002 *Priority Cultural Resources in Pima County: The Sonoran Desert Conservation Plan*. Report on file, Pima County, Arizona.
- David, Bruno, and Julian Thomas  
2008 Landscape Archaeology: Introduction. In *Handbook of Landscape Archaeology*, edited by Bruno David and Julian Thomas, pp. 27–43. Left Coast Press, Walnut Creek, California.
- Ebert, James I.  
2001 *Distributional Archaeology*. University of New Mexico Press, Albuquerque.
- Fowles, Severin  
2010 The Southwest School of Landscape Archaeology. *Annual Review of Anthropology* 39:453–468.



- Gailing, Ludger, and Markus Leibenath  
2015 The Social Construction of Landscapes: Two Theoretical Lenses and Their Empirical Applications. *Landscape Research* 40(2):1–16.
- Green, Paul R., Jeffrey H. Altschul, Michael Heilen, David W. Cushman, Jeffrey A. Homburg, Michael K. Lerch, William E. Hayden, and Joshua R. Trampier  
2012 Integrating Archaeological Modeling in DoD Cultural Resource Compliance. Report submitted to the Environmental Security and Technology Certification Program, Project RC-200720. SRI Foundation, Rio Rancho, New Mexico.
- Head, Lesley  
2008 Geographical Scale in Understanding Human Landscapes. In *Handbook of Landscape Archaeology*, edited by Bruno David and Julian Thomas, pp. 379–385. Left Coast Press, Walnut Creek, California.
- Heilen, Michael, Phillip O. Leckman, Adam Byrd, Jeffrey A. Homburg, and Robert A. Heckman  
2013 Archaeological Sensitivity Modeling in Southern New Mexico: Automated Tools and Models for Planning and Management. Statistical Research, Inc. Technical Report 11–26. Tucson, Arizona.
- Heilen, Michael, Seetha Reddy, Jeffrey Altschul, Robert Heckman, and Stephen Norris  
2015 Archaeological Locational and Significance Modeling at San Clemente Island, California. Draft Technical Report 15–58. Statistical Research, Inc., Redlands, California.
- Heilen, Michael P., Michael B. Schiffer, and J. Jefferson Reid  
2008 Landscape Formation Processes. In *Handbook of Landscape Archaeology*, edited by Bruno David and Julian Thomas, pp. 601–608. Left Coast Press, Walnut Creek, California.
- Heilen, Michael, Lynne Sebastian, Jeffrey H. Altschul, Phillip O. Leckman, and Adam Byrd  
2012 Modeling of Archaeological Site Location and Significance at White Sands Missile Range, New Mexico. Statistical Research, Inc. Technical Report 12–06. Tucson, Arizona.
- Hood, J. Edward  
1996 Social Relations and the Cultural Landscape. In *Landscape Archaeology: Reading and Interpreting the American Historical Landscape*, edited by Rebecca Yamin and Karen Bescherer Metheny, pp. 121–146. University of Tennessee Press, Knoxville.
- Hudak, G. Joseph, Elizabeth Hobbs, Allyson Brooks, Carol Ann Sersland, and Crystal Philips (editors)  
2002 A Predictive Model of Precontact Archaeological Site Location for the State of Minnesota. MnModel Final Report. Mn/DOT Agreement No. 73217. SHPO Ref. No. 95-4098. Electronic document, <http://www.mnmodel.dot.state.mn.us/TOC.html>, accessed December 1, 2008.
- Ingbar, Eric, Pat Barker, David Zeanah, Steve Wells, and John Snow  
2000 Expediting Permitting of Oil and Gas Exploration through Archaeological Modeling. Proceedings of the Eighth Annual International Petroleum Environmental Conference, 2000. University of Tulsa Press, Tulsa. Electronic document, <http://ipecc.utulsa.edu/conferences>, accessed March 12, 2016.
- Ingold, Timothy  
1993 The Temporality of the Landscape. *World Archaeology* 25(2):152–174.
- Jewell, Sally  
2013 Improving Mitigation Policies and Practices of the Department of the Interior. Secretary of the Interior Order No. 3330, October 31, 2013. Electronic document, [www.doi.gov/news/upload/Secretarial-Order-Mitigation.pdf](http://www.doi.gov/news/upload/Secretarial-Order-Mitigation.pdf), accessed March 12, 2016.
- Johnson, Mathew  
2012 Phenomenological Approaches in Landscape Archaeology. *Annual Reviews of Anthropology* 41:269–284.
- Kelly, Robert L.  
1995 *The Foraging Spectrum: Diversity in Hunter-Gatherer Lifeways*. Smithsonian Institution Press, Washington, D.C.
- Kohler, Timothy A.  
1988 Predictive Locational Modeling: History and Current Practice. In *Quantifying the Present and Predicting the Past: Theory, Method, and Application of Archaeological Predictive Modeling*, edited by W. James Judge and Lynne Sebastian, pp. 19–60. Bureau of Land Management, Denver, Colorado.
- Kvamme, Kenneth  
1988 Development and Testing of Quantitative Models. In *Quantifying the Present and Predicting the Past: Theory, Method, and Application of Archaeological Predictive Modeling*, edited by W. James Judge and Lynne Sebastian, pp. 325–428. Bureau of Land Management, Denver, Colorado.
- 1989 Geographic Information Systems in Regional Archaeological Research and Data Management. In *Archaeological Method and Theory*, vol. 1, edited by Michael B. Schiffer, pp. 139–203. University of Arizona Press, Tucson.
- Laurenzi, Andy  
2012 Priority Prehistoric Cultural Resources, Pinal County, Arizona. Technical Report No. 2012-101. Archaeology Southwest, Tucson.
- Laurenzi, Andy, Matthew A. Peeples, and William H. Doelle  
2013 Cultural Resources Priority Area Planning in Sub-Mogollon Arizona and New Mexico. *Advances in Archaeological Practice* 1(2):61–76.
- McManamon, Frank, John Doershuk, William Lipe, Tom McCulloch, Chris Polglase, Sarah Schlanger, Lynne Sebastian, and Lynne Sullivan  
2016 Using Values to Manage Archaeological Resources at a Landscape Scale. *Advances in Archaeological Practice* 4(2):132–148.
- Mehrer, Mark, and Konnie Wescott  
2006 *GIS and Archaeological Site Location Modeling*. CRC Press, Boca Raton, Florida.
- National Register of Historic Places (NRHP)  
1991 How to Apply the National Register Criteria for Evaluation. National Register Bulletin 15. National Park Service, Washington, D.C.
- Peeples, Matthew A., Jeffery J. Clark, William H. Doelle, Andy Laurenzi, and Barbara J. Mills  
2016 The Big Picture: The National Historic Preservation Act and Regional Syntheses in the U.S. Southwest. *Journal of Arizona Archaeology*. In press.
- Plog Fred T., and James N. Hill  
1971 Explaining Variability in the Distribution of Sites. In *The Distribution of Prehistoric Population Aggregates*, edited by George J. Gumerman, pp. 7–36. Prescott College Anthropological Reports 1. Prescott, Arizona.
- Raab, L. Mark, and Andrew Yatsko  
1990 Prehistoric Human Ecology of Quinquina, A Research Design for Archaeological Studies on San Clemente Island, Southern California. *Pacific Coast Archaeological Society Quarterly* 26(2 & 3):10–37.
- 2001 Maritime Archaeology and Research Design of Quinquina, San Clemente Island, California. Manuscript on file, Natural Resources Office, Navy Region Southwest, San Diego.
- Sebastian, Lynne  
2009 Deciding What Matters: Archaeology, Eligibility, and Significance. In *Archaeology and Cultural Resource Management: Visions for the Future*, edited by Lynne Sebastian and William Lipe, pp. 91–114. School for Advanced Research Press, Santa Fe.
- Sebastian, Lynne, C. Van West, and Jeffrey H. Altschul  
2005 Adaptive Management and Planning Models for Cultural Resources in Oil and Gas Fields: New Mexico PUMP III Project-Experimental: The New Mexico Modeling Project. In *Adaptive Management and Planning Models for Cultural Resources in Oil and Gas Fields in New Mexico and Wyoming: Final Technical Report (DE-FC26-02NT15445)*, edited by E. Ingbar et al., pp. 35–47. Department of Energy Technical Report. Electronic document at: <http://new.gnomon.net/Links>, accessed February 7, 2016.
- Steward, Julian  
1938 Basin-Plateau Aboriginal Socio-Political Groups. Bureau of American Ethnology Bulletin 120. Washington, D.C.
- 1955 *The Theory of Culture Change*. University of Illinois Press, Urbana.
- Strang, Veronica  
2008 Uncommon Ground: Landscapes as Social Geography. In *Handbook of Landscape Archaeology*, edited by Bruno David and Julian Thomas, pp. 51–59. Left Coast Press, Walnut Creek, California.

Sullivan, Alan P., III

2001 *Surface Archaeology*. University of New Mexico Press, Albuquerque.

2008 *Archaeological Concepts for the Study of the Past*. University of New Mexico Press, Albuquerque.

Thomas, David. H.

1971 *Prehistoric Settlement-Subsistence Patterns in the Reese River Valley, Central Nevada*. Ph.D. dissertation, University of California, Davis.

1972 A Computer Simulation Model of Great Basin Shoshonean Subsistence and Settlement Patterns. In *Models in Archaeology*, edited by David L. Clarke, pp. 671–704. Methuen, London.

1973 An Empirical Test for Steward's Model of Great Basin Settlement Patterns. *American Antiquity* 38(1):155–176.

1983 *The Archaeology of Monitor Valley, I: Epistemology*. Anthropological Papers of the American Museum of Natural History 58(1), New York.

1988 *The Archaeology of Monitor Valley, III: Survey and Additional Excavations*. Anthropological Papers of the American Museum of Natural History 66(2). New York.

Thomas, Julian

1996 *Time, Culture and Identity*. Routledge, London.

Tilley, Christopher

1994 *A Phenomenology of Landscape: Places, Paths and Monuments*. Berg, Oxford.

Trigger, Bruce G.

1989 *A History of Archaeological Thought*. Cambridge University Press, Cambridge.

van der Leeuw, Sander, and Charles L. Redman

2002 Placing Archaeology at the Center of Socio-Natural Studies. *American Antiquity* 67:597–605.

Wandsnider, LuAnn

1998 Regional Scale Processes and Archaeological Landscape Units. In *Unit Issues in Archaeology: Measuring Time, Space, and Material*, edited by Ann R. Ramenofsky and Anastasia Steffen, pp. 87–102. University of Utah Press, Salt Lake City.

Wandsnider, LuAnn and Jacqueline Rossignol (editors)

1992 *Space, Time, and Archaeological Landscapes*. Plenum Press, New York.

Whittlesey, Stephanie M.

2004 Mesoamerica, the Hohokam, and the Tucson Basin. In *Pots, Potters, and Models: Archaeological Investigations at the SRI Locus of the West Branch Site, Tucson, Arizona: Vol. 2. Synthesis and Interpretations*, edited by Stephanie. M. Whittlesey, pp. 509–530. Technical Series No. 80. Statistical Research, Inc., Tucson, Arizona, and Redlands, California.

Wilshusen, Richard, Michael Heilen, Wade Catts, Karyn de Dufour, and Bradford Jones

2016 Archaeological Survey Data Quality, Durability, and Use: Findings and Recommendations. *Advances in Archaeological Practice* 4(2):106–117.

Wu, Jianguo, and Ye Qi

2000 Dealing with Scale in Landscape Analysis: An Overview. *Geographic Information Sciences* 6(1):1–5.

Zeanah, David W., Eric Ingbar, Robert Elston, and Charles Zeier

2004 *Archaeological Predictive Model, Management Plan, and Treatment Plans for Northern Railroad Valley, Nevada*. Cultural Resources Series 15. Reno: Bureau of Land Management, Nevada. Electronic document, [www.blm.gov/nv](http://www.blm.gov/nv), accessed March 12, 2016.

Zedeño, María Nieves

1997 Landscapes, Land Use, and the History of Territory Formation: An Example from the Puebloan Southwest. *Journal of Archaeological Method and Theory* 4:67–103.

2000 On What People Make of Places: A Behavioral Cartography. In *Social Theory in Archaeology*, edited by Michael B. Schiffer, pp. 97–111. University of Utah Press, Salt Lake City.

## AUTHOR INFORMATION

**William H. Doelle** ■ Archaeology Southwest ([wdoelle@archaeologysouthwest.org](mailto:wdoelle@archaeologysouthwest.org))

**Pat Barker** ■ University of Nevada, Reno ([barkerj@unr.edu](mailto:barkerj@unr.edu))

**David Cushman** ■ SRI Foundation ([dcushman@srifoundation.org](mailto:dcushman@srifoundation.org))

**Michael Heilen** ■ Statistical Research, Inc. ([mheilen@srcrm.com](mailto:mheilen@srcrm.com))

**Cynthia Herhahn** ■ Bureau of Land Management, New Mexico State Office ([cherhahn@gmail.com](mailto:cherhahn@gmail.com))

**Christina Rieth** ■ New York State Museum ([Christina.Rieth@nysed.gov](mailto:Christina.Rieth@nysed.gov))

June 7, 2016

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



**Preserving & Protecting Arizona's  
Cultural Resources**

Re: Interstate 11 Corridor Environmental Study Area

To whom it may concern:

We have been members of the Arizona Site Stewards Program, State Historic Preservation Office, Arizona State Parks, for over 20 years and are familiar with the cultural sites in the Gillespie Dam area on Old Hwy 80 north of Gila Bend, AZ. Adding to our knowledge of the area is the experience of having lived on [REDACTED] our entire adult lives. The chief objective of the Stewards Program is to report to the various land managers destruction or vandalism of prehistoric and historic archaeological and paleontological sites in Arizona through site monitoring.

The western edge of the Corridor Study Area Map appears to include the area adjacent to Gillespie Dam/Gillespie Bridge. This is not a good location for the Interstate 11 alignment for the following reasons:

- 1) Just below the Gillespie Bridge is a right-of-way for numerous utilities such as the large APS utility towers and the El Paso Natural Gas lines
- 2) Numerous cultural sites are located on top and down the sides of the mountain on the western side to which Gillespie Dam is affixed.
- 3) Along Old Hwy 80 east of the Gillespie Bridge is a prehistoric village called the Gillespie Dam Site, AZ T:13:18
- 4) If the I-11 alignment is located farther downstream from the utility right-of-way near Gillespie Bridge, then it would likely destroy the petroglyphs located on the malapai bluffs on the west side of the river. Locally, these are known as the Gillespie Dam Petroglyph Sites.
- 5) The Gila River widens quickly south of the Gillespie Bridge and utility right-of-way and it would be very expensive to build bridges there even if the cultural sites were not present.
- 6) Adding another large paved corridor to this area would further disrupt wildlife corridors for the larger wildlife moving from the Gila Bend Mountains to the Sonoran Desert National Monument and Maricopa Mountain ranges.

The Mexican trucks are already using State Route 85 to move through this area. Why not add the infrastructure required for an interstate and another two lanes to SR 85? That makes the most sense since there are two bridges constructed already over the Gila River on SR 85 southwest of Buckeye.

Perhaps the City of Goodyear would be the most interested stakeholder in the I-11 alignment since that city has annexed the area of Mobile.

Maricopa County Department of Transportation was made aware of the cultural sites near Gillespie Dam/Gillespie Bridge during their Hidden Waters Parkway Study in 2010. Perhaps ADOT personnel should contact MCDOT regarding their findings concerning the Gillespie Bridge/Old Hwy 80 area.

Sincerely yours,



June 15, 2016

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



Preserving & Protecting Arizona's  
Resources

Re: Interstate 11 Corridor Environmental Study Area

To whom it may concern:

It has come to my attention as a site steward who has visited the cultural sites in the Gillespie Dam area on Old Hwy 80 north of Gila Bend, AZ that there may well be plans to build a new highway in the area adjacent to Gillespie Dam/Gillespie Bridge. This is not a good location for the Interstate 11 alignment for the following reasons, all of which you have received from other site stewards:

Just below the Gillespie Bridge is a right-of-way for numerous utilities such as the large APS utility towers and the El Paso Natural Gas lines. In addition, numerous cultural sites are located on top and down the sides of the mountain on the western side to which Gillespie Dam is affixed. Along Old Hwy 80 east of the Gillespie Bridge is a prehistoric village called the Gillespie Dam Site, AZ T:13:18 The Gillespie Dam Petroglyph site is put at risk by the planned alignment. And wildlife corridors would also be disrupted by addition of another highway in the area.

I agree with the Pierpoints, whose letter you have already received, that since Mexican trucks are using State Route 85, why not add the infrastructure required for an interstate and another two lanes to SR 85? That makes the most sense since there are two bridges constructed already over the Gila River on SR 85 southwest of Buckeye.

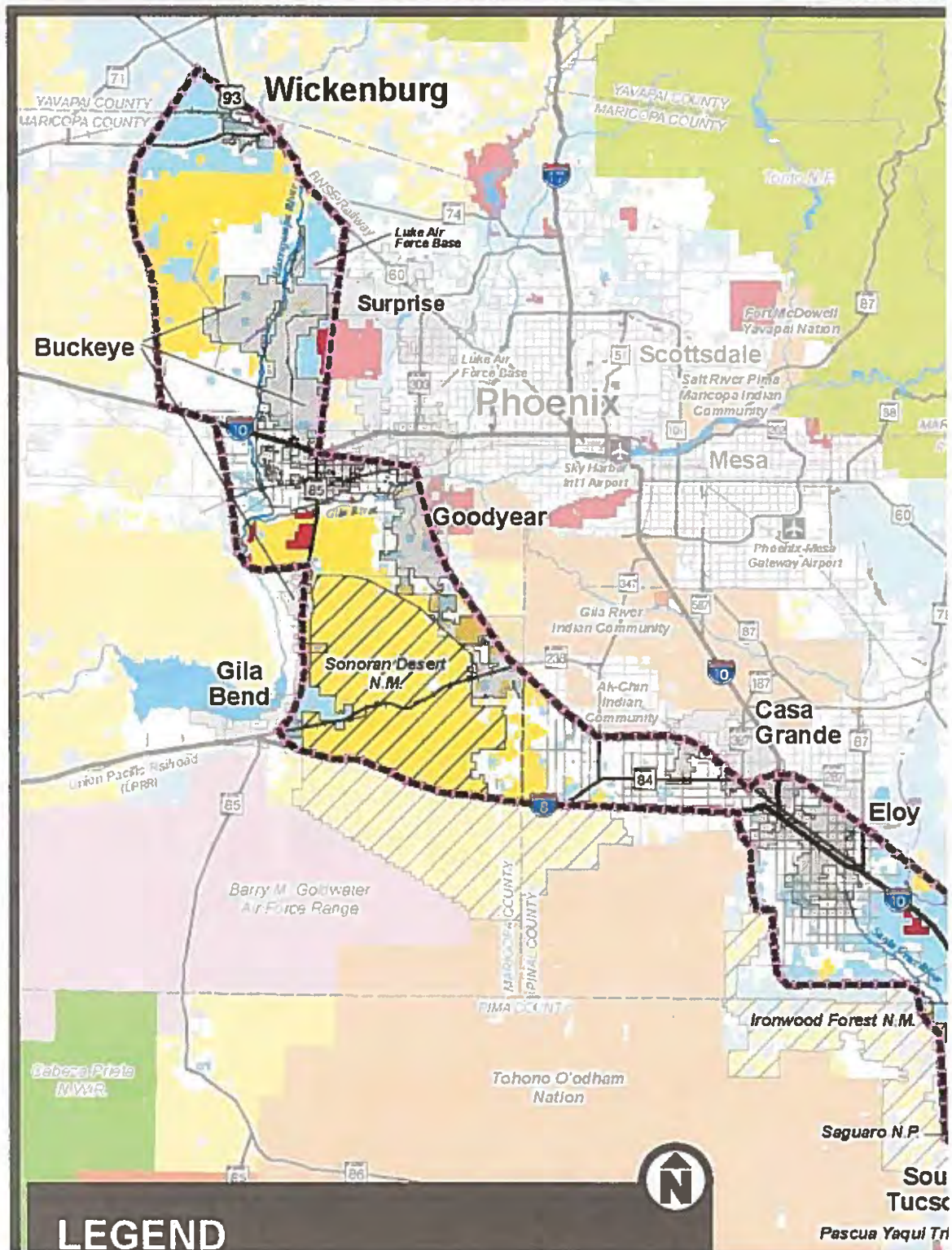
In any case, if the planned ADOT I-11 corridor study leads to construction of a major highway in the Gillespie Dam area, this would be a most unfortunate development and I hope that you will reach some other conclusion.

Sincerely yours,



5-31-16

# Interstate 11 Corridor Tier I Environmental CORRIDOR STUDY AREA



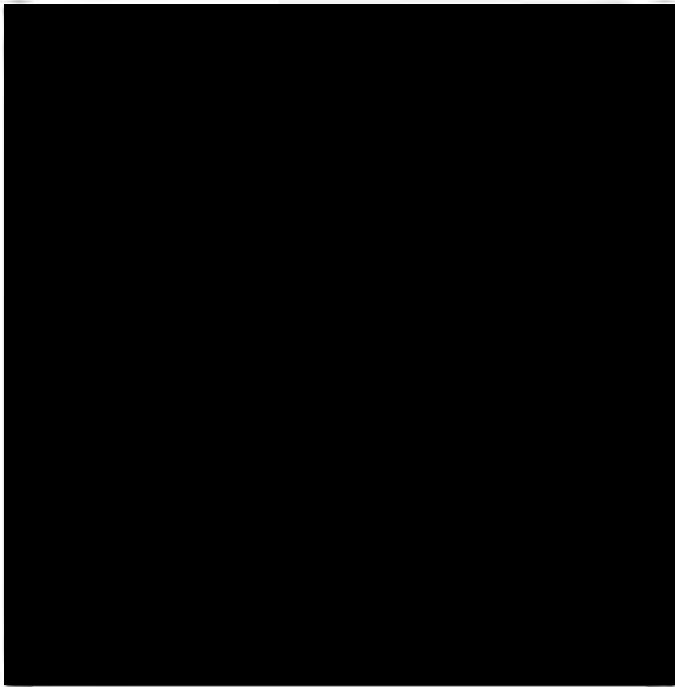
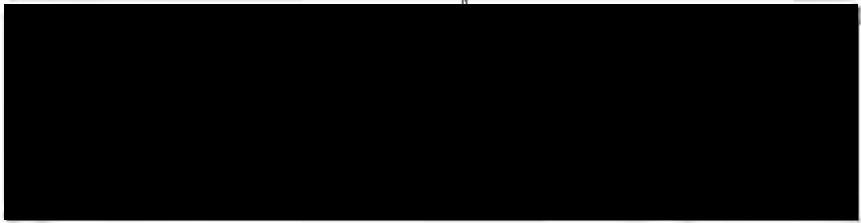
6/10/16

To Interstate 11 Tier 1 EIS study Team —

The proposed I-11 route through Avra Valley would displace people from their homes and businesses, create noise and air pollution for miles around, kill or displace wildlife, and strip the land of native vegetation, contributing to further desertification and less rainfall in the Tucson area.

What is the advantage of this route to anyone besides wealthy developers? The option of double-decking six miles of I-10 would be considerably cheaper and create much less disruption.

We are long-time Pima County residents asking you to act in consideration of people and the earth rather than the rich and powerful.



Triangle Airpark  
(AZ-50)  
20496 N Mooney Dr.  
White Hills AZ 86445  
MM 27.5 HWY US93  
(Interstate 11)

June 10 2016

ADOT  
206 S 17<sup>th</sup> Ave  
Phoenix, AZ 85007

Re: Your Letter of April 14 2015  
Requesting Comments

The Triangle Airpark (AZ50) suggests you place "Low Flying Aircraft" signs for the North and South US93 vehicle traffic.

Two of our runways have approaches/departures which overfly the highway.

It would also help safety if our highway vehicle entrance had a Deceleration Lane and a Acceleration Lane.

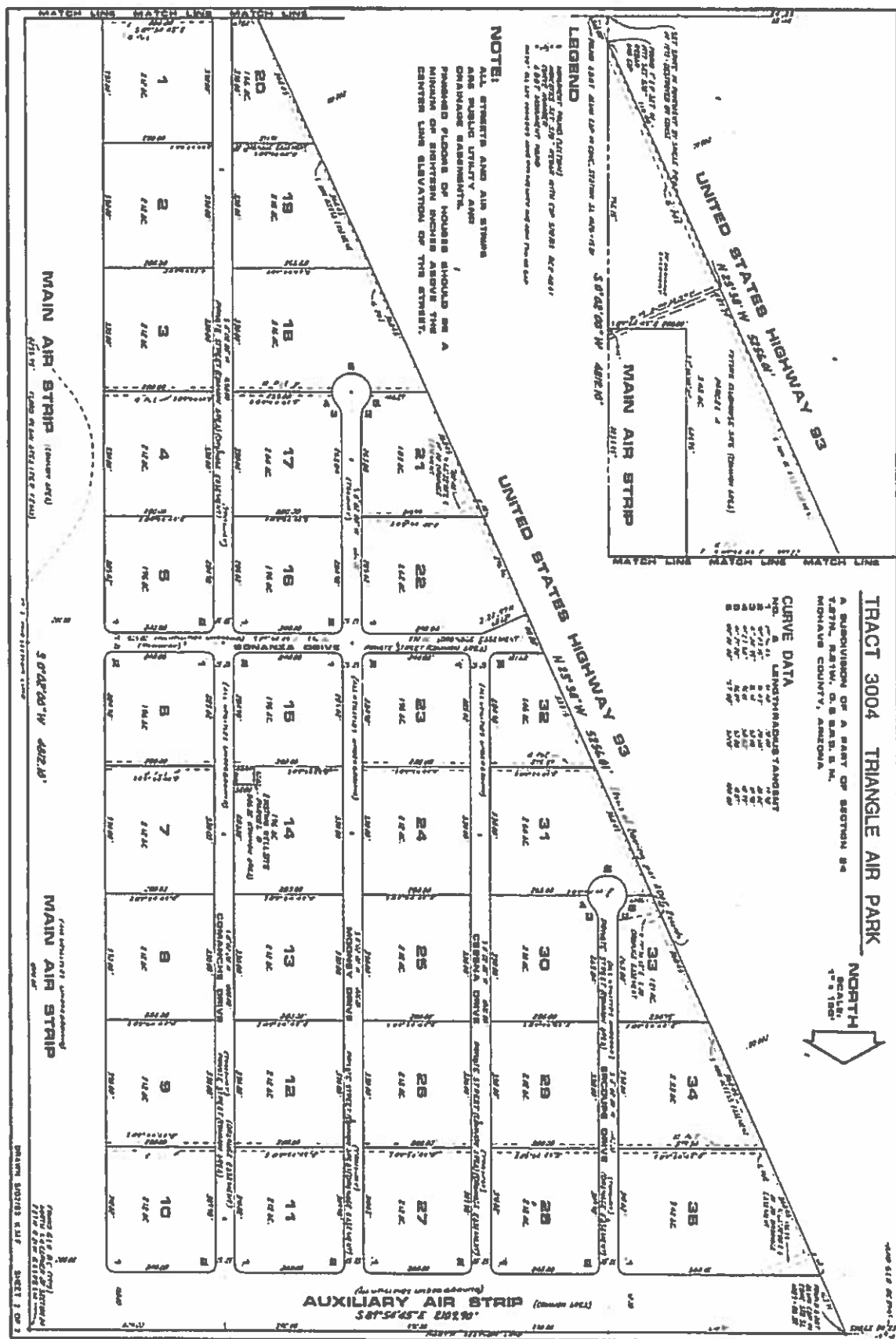
All overhead wires /obstructions in our RUNWAY approaches need to marked (orange balls etc.) to increase visibility for landing and departing aircraft operations.

SEE ENCLOSED MAP:

Thank You









6-25-16

please don't Build this thru - phx  
OR please find another route

I have no need for Fast Trains  
I'm not From JAPAN. I like it  
the way it is. I don't mind slow  
travel by the way 75 mph is not slow

plus the roads already Est in  
phx mean something like McDowell  
& Van Buren These men were  
great men in phx history & helped  
Build AZ's meaning today

you can't just dig that up &  
discard the names

AZ <sup>MAYOR</sup> ~~GOVERNOR~~ just got a proposition  
passed for Higher taxes for the  
next 35 years to pay for a light-  
rail system thru Phoenix & keeps  
trying to portray AZ like Sacramento  
or San Francisco. A light rail system  
I will not use but I will pay for  
for the rest of my life. I have  
had enough Idealistic (what's good for me)  
ideas. I realize we get fed money for —

projects but SURELY There must be other things that have not been invented yet that we need more, these funds are misdirected we ~~are~~ need to solve societies issues which ARE!

1. NATURAL DISASTERS (Relief)
2. How to protect people from TSUNAMIS
3. HURRICANE WALLS.
4. PROBLEMS that mother earth HAS
5. AGRICULTURE issues

you know things that will really help people

we still flit around like ants in a flood

I draw attention to Henry Ford <sup>Americans</sup> & Thomas Edison who ~~was~~ with there Ideas helped Every person country on EARTH. This is the way our \$ is supposed to be spent. It is important to preserve the most

Thank you,

[REDACTED]

# BOULDER CITY AERO CLUB INC

20496 N Mooney Dr  
White Hills AZ 86445

To:

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

06/29/2016

Dear Team,

Thank you for the meeting notices concerning the new Interstate Hwy 11 through NW AZ that will follow along US93.

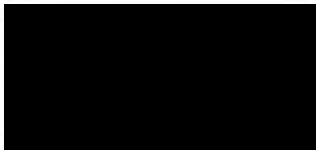
Triangle Airpark is a Residential Community and Airport located north of Kingman AZ on HWY US93 mile marker 27.5 .

Approaches and departures from our Runways overfly HWY US93

We are interested in seeing your options for the highway elevations and obstacles.

Also options for service roads.

Thank You,



## Telephone Responses

---

# RECORD OF CONVERSATION

<b>CONTACT DATE:</b> Thursday, June 9, 2016		<b>CONTACT TIME:</b> 3:29pm	
<b>STAKEHOLDER NAME:</b> [REDACTED]		<b>ADDRESS:</b>	
<b>PHONE:</b> [REDACTED]		<b>EMAIL:</b>	
<b>CONTACT METHOD:</b> Phone		<b>RECORDED BY (STAFF NAME):</b> [REDACTED]	
<b>Comments/Questions:</b>			
<p>[REDACTED] Architect and lives in the Laveen area. He saw the ad in the paper regarding the meeting in Buckeye on the 15<sup>th</sup>. He is hoping to make it, but he may not be able to and would like someone to call him so he can obtain more information.</p>			
<b>Response:</b>			
DATE	TIME	RESPONDER (STAFF NAME)	CONTENT OF RESPONSE

# RECORD OF CONVERSATION

<b>CONTACT DATE:</b> Friday, June 10, 2016		<b>CONTACT TIME:</b> 3:21pm	
<b>STAKEHOLDER NAME:</b> [REDACTED]		<b>ADDRESS:</b>	
<b>PHONE:</b> [REDACTED]		<b>EMAIL:</b>	
<b>CONTACT METHOD:</b> Phone		<b>RECORDED BY (STAFF NAME):</b> [REDACTED]	
<b>Comments/Questions:</b>			
<p>[REDACTED] would like to discuss the potential route of I-11 through Maricopa county and Phoenix area. It is his understanding that there are 2 potential routes and he would like to find out when a final route will be determined and discuss the routes that are being considered.</p>			
<b>Response:</b>			
DATE	TIME	RESPONDER (STAFF NAME)	CONTENT OF RESPONSE



# RECORD OF CONVERSATION

<b>CONTACT DATE:</b> 06/22/2016		<b>CONTACT TIME:</b> 5:37 PM	
<b>STAKEHOLDER NAME:</b> [REDACTED]		<b>ADDRESS:</b>	
<b>PHONE:</b> [REDACTED]		<b>EMAIL:</b>	
<b>CONTACT METHOD:</b> Phone		<b>RECORDED BY (STAFF NAME):</b> [REDACTED]	
<b>Comments/Questions:</b>			
<p>States the I-11 project will serve as the backbone for the CANAMEX Highway which aligns the project directly to the Trans Pacific Partnership (TPP). Highly against project as he believes it is illegal. States land barons will benefit from the project in an illegal way. Believes the project will take away U.S. sovereignty. No call back requested on this record of Conversation.</p>			
<b>Response:</b>			
DATE	TIME	RESPONDER (STAFF NAME)	CONTENT OF RESPONSE

# RECORD OF CONVERSATION

<b>CONTACT DATE:</b> 06/23/2016		<b>CONTACT TIME:</b> 2:33 PM	
<b>STAKEHOLDER NAME:</b> [REDACTED]		<b>ADDRESS:</b>	
<b>PHONE:</b> [REDACTED]		<b>EMAIL:</b>	
<b>CONTACT METHOD:</b> Phone		<b>RECORDED BY (STAFF NAME):</b> [REDACTED]	
<b>Comments/Questions:</b>			
<p>Would like to know if her subdivision in Avra Valley will be condemned for eminent domain if a route is selected in that region. Subdivision located near Amway Rd and Manville Rd.</p>			
<b>Response:</b>			
<b>DATE</b>	<b>TIME</b>	<b>RESPONDER (STAFF NAME)</b>	<b>CONTENT OF RESPONSE</b>
6/27/16	10:30 AM	[REDACTED]	Informed [REDACTED] we are in Tier 1 of the EIS, there are still several steps before a route is selected and funded. Advised the process may take up to 20 years.

# RECORD OF CONVERSATION

<b>CONTACT DATE:</b> 06/23/2016		<b>CONTACT TIME:</b> 10:35 AM	
<b>STAKEHOLDER NAME:</b> N/A		<b>ADDRESS:</b>	
<b>PHONE:</b> [REDACTED]		<b>EMAIL:</b>	
<b>CONTACT METHOD:</b> Phone		<b>RECORDED BY (STAFF NAME):</b> [REDACTED]	
<b>Comments/Questions:</b>			
<p>Concerned that I-11 corridor will be used for sex-trafficking crimes. Wants the project team to consider sex-trafficking as a serious concern for the I-11.</p>			
<b>Response:</b>			
<b>DATE</b>	<b>TIME</b>	<b>RESPONDER (STAFF NAME)</b>	<b>CONTENT OF RESPONSE</b>
6/24/2016	1:45 PM	[REDACTED]	Stakeholder refused to give her name. She was directed to study site for more information about i-11.

# RECORD OF CONVERSATION

<b>CONTACT DATE:</b> 06/30/2016		<b>CONTACT TIME:</b> 2:30pm	
<b>STAKEHOLDER NAME:</b> [REDACTED]		<b>ADDRESS:</b>	
<b>PHONE:</b> [REDACTED]		<b>EMAIL:</b>	
<b>CONTACT METHOD:</b> Phone		<b>RECORDED BY (STAFF NAME):</b> [REDACTED]	
<b>Comments/Questions:</b>			
<p>On the proposed I-11 corridor between the central section of phoenix to the northern section of phoenix, what was the road south of the I-10 that it is coming up? Is that 355<sup>th</sup> or 339<sup>th</sup> where the TA is?</p> <p>Please have someone call me to answer these questions.</p>			
<b>Response:</b>			
<b>DATE</b>	<b>TIME</b>	<b>RESPONDER (STAFF NAME)</b>	<b>CONTENT OF RESPONSE</b>

# RECORD OF CONVERSATION

<b>CONTACT DATE:</b> 07/07/2016		<b>CONTACT TIME:</b> 11:13AM	
<b>STAKEHOLDER NAME:</b> [REDACTED]		<b>ADDRESS:</b>	
<b>PHONE:</b> [REDACTED]		<b>EMAIL:</b>	
<b>CONTACT METHOD:</b> Phone		<b>RECORDED BY (STAFF NAME):</b> [REDACTED]	
<b>Comments/Questions:</b>			
<p>Trying to figure out exactly what roads are impacted. Buying property near Whitman towards Wickenburg and wondering what areas are directly impacted by the I-11 corridor. Looking for more details.</p>			
<b>Response:</b>			
DATE	TIME	RESPONDER (STAFF NAME)	CONTENT OF RESPONSE

# RECORD OF CONVERSATION

<b>CONTACT DATE:</b> 07/08/2016		<b>CONTACT TIME:</b> 4:09pm	
<b>STAKEHOLDER NAME:</b> [REDACTED]		<b>ADDRESS:</b> [REDACTED]	
<b>PHONE:</b> [REDACTED]		<b>EMAIL:</b> [REDACTED]	
<b>CONTACT METHOD:</b> phone		<b>RECORDED BY (STAFF NAME):</b> [REDACTED]	
<b>Comments/Questions:</b>			
<p>Regards to corridor going through Aber Valley          She wishes to voice their Disapproval of I-11.          She would like to have someone call her back so she can explain why she and her husband disapprove of the I-11 project.</p>			
<b>Response:</b>			
<b>DATE</b>	<b>TIME</b>	<b>RESPONDER (STAFF NAME)</b>	<b>CONTENT OF RESPONSE</b>