



Scoping Summary Report – Final

January 2017



Federal Aid No. 999-M(161)S
ADOT Project No. 999 SW 0 M5180 01P



SUMMARY

This *Scoping Summary Report* documents the scoping process the Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) completed for the I-11 Corridor in compliance with the National Environmental Policy Act (NEPA). It summarizes the methods, meetings, and materials used to solicit feedback, as well as the comments and input received from the agencies, tribal governments, and public during the approximate 45-day scoping period from May 23, 2016 to July 8, 2016.

During the scoping period, the FHWA and ADOT conducted three agency and six public scoping meetings between June 7, 2016 and June 29, 2016. These scoping meetings were held throughout the Corridor Study Area, including Buckeye, Casa Grande, Marana, Nogales, Phoenix, Tucson, and Wickenburg, Arizona. The meetings attracted over 600 agency representatives and community members. Meeting attendees were encouraged to share verbal and written comments, as well as mark suggestions and concerns on maps of the Corridor Study Area. This report documents the process followed and summarizes major themes of comments received. The FHWA and ADOT will consider these comments as the I-11 Corridor advances into the next phase of the environmental review process.



Table of Contents

1	INTRODUCTION.....	1
1.1	Overview.....	1
1.2	Purpose of Report.....	1
2	SCOPING PROCESS.....	3
2.1	Overview of Scoping Process	3
2.2	Pre-Scoping Activities	3
2.3	Initiation of Scoping.....	3
2.4	Scoping Period and Meetings	4
3	AGENCY SCOPING	4
3.1	Agency Participants	4
3.1.1	Cooperating Agencies	4
3.1.2	Participating Agencies.....	5
3.2	Agency Scoping Meetings.....	8
3.3	Agency Scoping Comments.....	9
3.3.1	Overview of Agency Comments	14
3.3.2	Summary of Individual Agency Comments	14
4	PUBLIC SCOPING	29
4.1	Public Scoping Outreach.....	29
4.1.1	Notification	29
4.1.2	Title VI, Environmental Justice, and Limited English Proficiency	30
4.2	Public Scoping Meetings.....	31
4.3	Public Scoping Comments	33
4.3.1	Summary of Public Comments	34
4.3.2	Map Comments.....	39
5	SUMMARY AND NEXT STEPS.....	44
5.1	Alternatives Selection Report.....	44
5.2	Draft Tier 1 EIS.....	44
5.3	Final Tier 1 EIS and Record of Decision	45



Figures

Figure 1-1	I-11 Corridor Study Area (Nogales to Wickenburg)	2
Figure 3-1	Agency Scoping Meeting in Tucson	9
Figure 3-2	Agency Scoping Feedback on Corridor Alternative Preferences	10
Figure 3-3	Agency Scoping Feedback in South Section	11
Figure 3-4	Agency Scoping Feedback in Central Section	12
Figure 3-5	Agency Scoping Feedback in North Section	13
Figure 3-6	Agency Scoping Feedback from ADEQ	15
Figure 3-7	Agency Scoping Feedback from AGFD	17
Figure 4-1	Public Scoping Meeting in Tucson	32
Figure 4-2	Public Scoping Meeting in Casa Grande	33
Figure 4-3	Problems Experienced Today	35
Figure 4-4	Importance of What I-11 Should Be or Accommodate	35
Figure 4-5	Importance of Human Environmental Factors	36
Figure 4-6	Importance of Natural Environmental Factors	36
Figure 4-7	Public Scoping Feedback in South Section	40
Figure 4-8	Public Scoping Feedback in Central Section	41
Figure 4-9	Public Scoping Feedback in North Section	42
Figure 4-10	Public Scoping Feedback on Corridor Alternative Preferences	43
Figure 5-1	Corridor Alternatives Development and Environmental Review Process	45

Tables

Table 3-1	Cooperating Agencies	5
Table 3-2	Participating Agencies	6
Table 3-3	Agency Scoping Meetings	8
Table 4-1	Scoping Meeting Notice Publications	29
Table 4-2	Public Scoping Meetings	32
Table 4-3	Summary of Public Comments Received	34



Appendices

Appendix A	Scoping Notifications
Appendix B	Sample Agency Invitation Letters and Recipient List
Appendix C	Agency Scoping Meeting Materials
Appendix D	Agency Scoping Comments
Appendix E	Public Scoping Meeting Materials
Appendix F	Public Scoping Comments
Appendix G	Media Coverage

Acronyms

AANG	Air National Guard
ACC	Arizona Corporation Commission
ACEC	Area of Critical Environmental Concern
ACHP	Advisory Council on Historic Preservation
ADA	American with Disabilities Act
ADEQ	Arizona Department of Environmental Quality
ADOC	Department of Corrections
ADOT	Arizona Department of Transportation
ADPS	Department of Public Safety
ADWR	Department of Water Resources
AGFD	Arizona Game and Fish Department
APE	Area of Potential Effect
APS	Arizona Public Service
ASLD	Arizona State Land Department
ASM	Arizona State Museum
ASP	Arizona State Parks
ASR	Alternatives Selection Report
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
CAG	Central Arizona Governments
CAP	Central Arizona Project
CBP	Customs and Border Protection
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CNF	Coronado National Forest
CWA	Clean Water Act
CYMPO	Central Yavapai Metropolitan Planning Organization
EIS	Environmental Impact Statement
ESA	Endangered Species Act



FAA	Federal Aviation Administration
FAST	Fixing America’s Surface Transportation
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FRA	Federal Railroad Administration
FRS	Flood Retardant Structure
FTA	Federal Transit Administration
GHG	Greenhouse Gas
I	Interstate
IWCS	I-11 and Intermountain West Corridor Study
LEP	Limited English Proficiency
MAG	Maricopa Association of Governments
MAP-21	Moving Ahead for Progress in the 21st Century Act
MPO	Metropolitan Planning Organization
NAAQS	National Ambient Air Quality Standards
NACOG	Northern Arizona Council of Governments
NDOT	Nevada Department of Transportation
NEPA	National Environmental Policy Act
NHL	National Historic Landmarks
NOI	Notice of Intent
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
PAG	Pima Association of Governments
PEL	Planning and Environmental Linkages
PIP	Phased Implementation Plan
PM	Particulate Matter
Reclamation	Bureau of Reclamation
RID	Roosevelt Irrigation District
RMP	Resource Management Plans
ROD	Record of Decision
RSRSM	Regionally Significant Routes for Safety and Mobility
RTC	Regional Transportation Commission of Southern Nevada
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SCIDD	San Carlos Irrigation and Drainage District
SCMPO	Sun Corridor Metropolitan Planning Organization
SEAGO	SouthEastern Association of Governments
SHPO	State Historic Preservation Office
SR	State Route
SRP	Salt River Project
TCP	Traditional Cultural Property



TEP	Tucson Electric Power
UPRR	Union Pacific Railroad
US	United States
USACE	US Army Corps of Engineers
USAF	US Air Force
USDA	US Department of Agriculture
USDOT	US Department of Transportation
USEPA	Environmental Protection Agency
USFS	US Forest Service
USFWS	US Fish and Wildlife Service
Western	Western Area Power Administration

1 INTRODUCTION

1.1 Overview

The Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) have initiated the environmental review process for the Interstate 11 (I-11) Corridor from Nogales to Wickenburg, Arizona. An Alternatives Selection Report (ASR) and Tier 1 Environmental Impact Statement (EIS) will be prepared as part of this process in accordance with the National Environmental Policy Act (NEPA) and other regulatory requirements. The FHWA is the Federal Lead Agency and ADOT is the Local Project Sponsor under NEPA.

The environmental review process builds upon the prior *I-11 and Intermountain West Corridor Study (IWCS)* completed in 2014, which was a multimodal planning effort that involved ADOT, the Nevada Department of Transportation (NDOT), FHWA, Federal Railroad Administration (FRA), Maricopa Association of Governments (MAG), Regional Transportation Commission of Southern Nevada (RTC), and other key stakeholders. The IWCS identified the I-11 Corridor as a critical piece of multimodal infrastructure that would diversify, support, and connect the economies of Arizona and Nevada. The study also concluded that it could be part of a larger north-south transportation corridor, linking Mexico and Canada.

In December 2015, the United States (US) Congress approved the Fixing America's Surface Transportation (FAST) Act, which is a 5-year legislation to improve the Nation's surface transportation infrastructure. The FAST Act formally designates I-11 throughout Arizona, reinforcing ADOT's overall concept for the I-11 Corridor that emerged from the IWCS study.

The FHWA and ADOT are continuing to study the I-11 Corridor in Arizona for the approximate 280-mile section between Nogales and Wickenburg, as shown on **Figure 1-1** (I-11 Corridor Study Area [Nogales to Wickenburg]). Initially, the ASR will assess a comprehensive range of corridor alternatives through a robust evaluation process that uses public and agency input as well as various topographical, environmental, and other planning information to help identify opportunities and constraints. The number of corridor alternatives will then be reduced to a reasonable range and carried forward into the Draft Tier 1 EIS along with the No Build Alternative (i.e., do-nothing option).

The Draft Tier 1 EIS will continue to assess in more detail the potential social, economic, and natural environmental impacts of the No Build Alternative and remaining corridor alternatives (i.e., Build Alternatives). A Preferred Corridor Alternative will be identified in the Draft Tier 1 EIS, including a Phased Implementation Plan (PIP) that will provide an initial concept for proposed incremental projects within the I-11 Corridor that could be pursued in the future following completion of the Tier 1 EIS. A combined Final Tier 1 EIS and Record of Decision (ROD) will document a Selected Corridor Alternative (2,000 feet wide) from Nogales to Wickenburg, or select the No Build Alternative.

1.2 Purpose of Report

This *Scoping Summary Report* documents the scoping process the FHWA and ADOT completed for the I-11 Corridor in compliance with NEPA. It summarizes the methods, meetings, and materials used to solicit feedback, as well as the comments and input received from the agencies, tribal governments, and public during the approximate 45-day scoping period from May 23, 2016 to July 8, 2016.

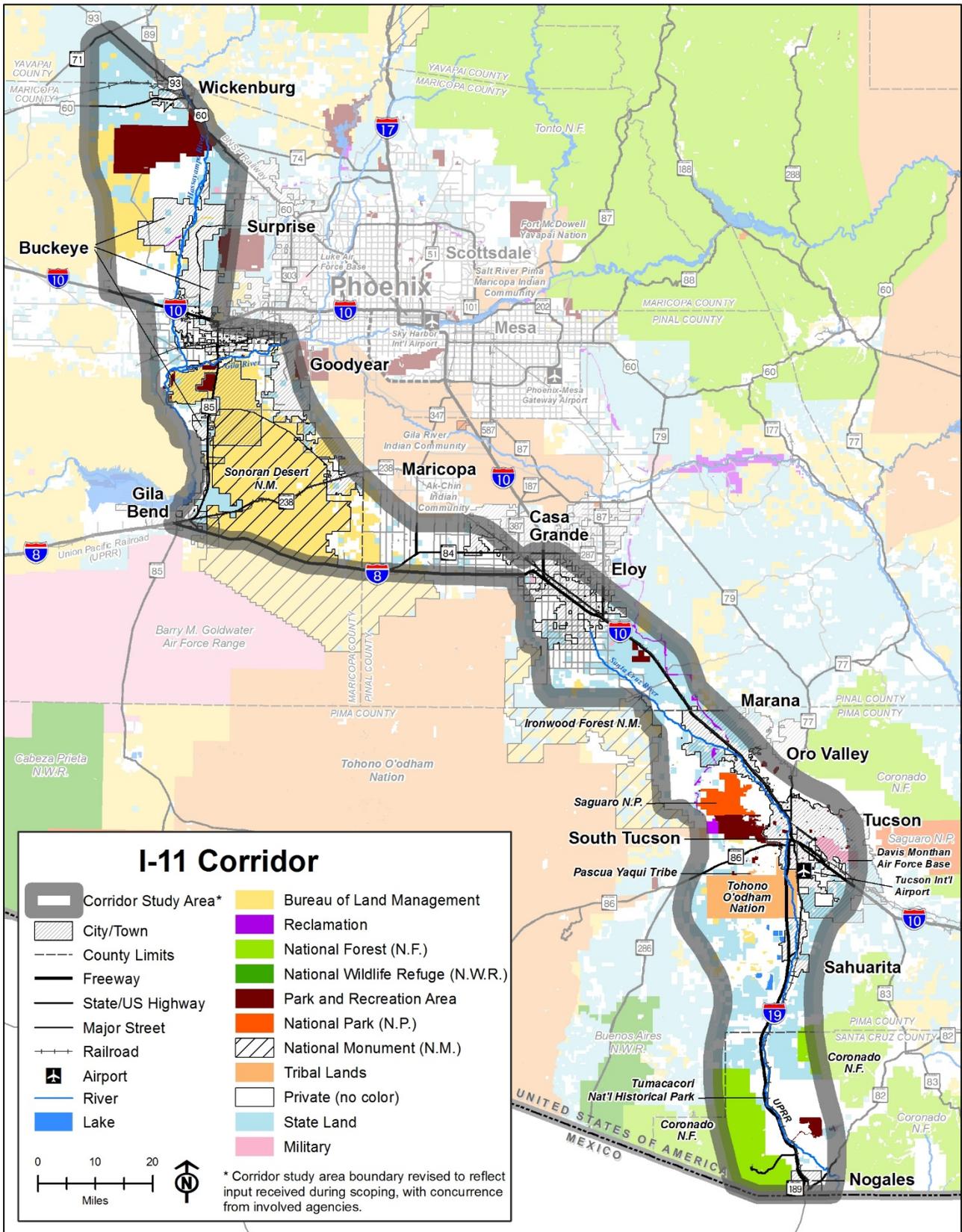


Figure 1-1 I-11 Corridor Study Area (Nogales to Wickenburg)

2 SCOPING PROCESS

2.1 Overview of Scoping Process

Scoping is an initial step in the environmental review process under NEPA. The Council on Environmental Quality's (CEQ) NEPA Regulations (40 Code of Federal Regulations [CFR] § 1501.7) states that the Federal Lead Agency should engage in scoping to provide an early and open process for determining the scope, or range, of issues to be addressed and identifying the significant issues related to a proposed action. In short, scoping is the process of determining the “scope” and content of the Tier 1 EIS.

Scoping serves the following purposes at the beginning of the environmental review process:

- Informs the agencies and public about the study process and intent;
- Connects previous planning decisions with current study development;
- Seeks early feedback from the agencies, tribal governments, and public on:
 - Purpose and need
 - Alternatives to be studied
 - Impacts to be evaluated
 - Evaluation methods to be used;
- Looks for opportunities to streamline the study process and collaborate with partners; and
- Establishes a decision-making framework, including agency participation and responsibilities.

The input FHWA and ADOT received during scoping will help to identify the opportunities and constraints within the study area, range of corridor alternatives to be studied, and the depth and breadth of environmental analysis to be completed.

2.2 Pre-Scoping Activities

The FHWA and ADOT held approximately 50 pre-scoping meetings with federal, state, regional, county, local, and tribal governments, as well as other organizations. These pre-scoping meetings were conducted to elicit information, issues, and concerns and discuss the Tier 1 EIS process with the agencies and other key stakeholders in advance of formal scoping for the environmental review process. All agencies were encouraged to participate in the study and submit formal, written comments during the subsequent official scoping period. They were informed that information and input shared during pre-scoping meetings or other prior studies did not replace the official scoping period and comments submitted.

2.3 Initiation of Scoping

The FHWA issued the Notice of Intent (NOI) to prepare a Tier 1 EIS in the Federal Register (Volume 81, Number 98) on May 20, 2016. The NOI notified interested parties regarding the intent to prepare a Tier 1 EIS for the I-11 Corridor and invited the agencies and public to participate in the environmental review process. It also provided information on the nature of the I-11 Corridor and solicited agency and public input on the scope of the Tier 1 EIS, including the purpose and need, potential corridor alternatives to be studied, impacts to be evaluated, and

evaluation methods to be used. In addition, the NOI also provided information on the prior IWCS effort, which laid the groundwork for this study through the Planning and Environmental Linkages (PEL) process. Information on the scoping period, as well as the process for submitting scoping comments was presented. The published NOI is provided in **Appendix A** (Scoping Notifications).

2.4 Scoping Period and Meetings

The scoping process was conducted in accordance with NEPA requirements. The approximate 45-day scoping period began on May 23, 2016 and ended July 8, 2016. The FHWA and ADOT invited agencies, tribal governments, and organizations by letter to participate in the scoping process and attend agency scoping meetings. Sample agency invitation letters and the recipient list are presented in **Appendix B** (Sample Agency Invitation Letters and Recipient List). Three agency scoping meetings were held in the following locations along the Corridor Study Area: Casa Grande; Phoenix; and Tucson.

The public was notified about the scoping process, public scoping meeting locations, and schedule via newspaper advertisements, website (i11study.com/Arizona), e-mail blasts, social media, news releases, media interviews, and blog posts. Six public scoping meetings were held in the Corridor Study Area: Buckeye; Casa Grande; Marana; Nogales; Tucson; and Wickenburg.

A summary of the agency, tribal government, and public scoping process is provided in the following sections. The meeting materials and comments for the agencies are included in **Appendix C** (Agency Scoping Meeting Materials) and **Appendix D** (Agency Scoping Comments), respectively. The public scoping meeting materials and comments are found in **Appendix E** (Public Scoping Meeting Materials) and **Appendix F** (Public Scoping Comments), respectively. A list of the media coverage received during the scoping period is located in **Appendix G** (Media Coverage).

3 AGENCY SCOPING

3.1 Agency Participants

The FHWA and ADOT requested agencies and tribal governments to participate in the environmental review process by inviting them to be a Cooperating Agency or Participating Agency under NEPA. Each is described in the following sections. Sample invitation letters that were sent to the agencies and tribal governments during scoping are provided in **Appendix B** (Sample Agency Invitation Letters and Recipient List).

3.1.1 Cooperating Agencies

Cooperating Agencies are, by definition in Title 40 CFR 1508.5 and 23 CFR 771.111(d), federal agencies with jurisdiction by law or special expertise with respect to any environmental impact involved in the study. Other agencies or tribal governments of similar qualifications may also qualify, if FHWA concurs. Cooperating Agencies have a slightly greater degree of responsibility and involvement in the environmental review process than Participating Agencies (discussed further below in **Section 3.1.2**).

Table 3-1 (Cooperating Agencies) lists the nine federal agencies invited to be a Cooperating Agency, along with their response to the invitation. Of those, eight federal agencies accepted the invitation, and one federal agency opted to be a Participating Agency instead. One state agency requested status as a Cooperating Agency due to jurisdiction by Arizona State law; FHWA concurred with their request. As such, there is a total of nine Cooperating Agencies. Responses from the agencies are provided in **Appendix D** (Agency Scoping Comments).

Table 3-1 Cooperating Agencies

Agency	Response to Invitation
Federal	
Bureau of Land Management (BLM)	Accepted
Federal Aviation Administration (FAA)	Accepted
Federal Railroad Administration (FRA)	Accepted
National Park Service (NPS)	Accepted
US Bureau of Reclamation (Reclamation)	Accepted
US Environmental Protection Agency (USEPA)	Accepted
US Fish and Wildlife Service (USFWS)	Accepted
US Forest Service (USFS), Coronado National Forest	Accepted
Western Area Power Administration (Western)	Opted to be Participating Agency
State	
Arizona Game and Fish Department (AGFD)	Invited as Participating Agency; Requested to be Cooperating Agency and provided justification in June 17, 2016 letter; FHWA concurred with request in July 18, 2016 letter

3.1.2 Participating Agencies

Participating Agencies, as defined in Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), can be federal, state, regional, county, and local agencies, as well as tribal governments that may have an interest in the I-11 Corridor. **Table 3-2** (Participating Agencies) lists the 67 agencies invited to be a Participating Agency, along with their response to the invitation.

Of those, 40 initially accepted the invitation. One state agency requested to change status from Participating to Cooperating, with FHWA’s concurrence; and one federal agency opted to be a Participating Agency versus a Cooperating Agency. The remaining agencies did not respond; FHWA and ADOT followed up with these agencies on their intended participation. Several agencies accepted the follow-up invitation, resulting in a total of 52 Participating Agencies. For those agencies that did not respond, dates of the follow-up outreach are noted in the table. Responses from the agencies and tribal governments are provided in **Appendix D** (Agency Scoping Comments), along with the log of additional outreach.



Table 3-2 Participating Agencies

Agency	Response to Invitation
Federal	
Bureau of Indian Affairs (BIA)	Accepted
Federal Emergency Management Agency (FEMA)	Accepted
Federal Transit Administration (FTA)	Followed up on 10/14/16 (phone) and 10/25/16 (phone); No Response
US Army Corps of Engineers (USACE)	Accepted
US Air Force (USAF), Davis-Monthan Air Force Base	Declined
US Air Force, Luke Air Force Base	Followed up on 10/14/16 (phone) and 10/25/16 (email); No Response
US Customs and Border Protection (CBP)	Accepted
US Department of Agriculture (USDA)	Accepted
Western Area Power Administration (Western)	Invited as Cooperating Agency; Opted to be Participating Agency
State	
Arizona Air National Guard (AANG)	Followed up on 10/14/16 (phone); No Response
Arizona Corporation Commission (ACC)	Accepted
Arizona Department of Corrections (ADOC)	Accepted
Arizona Department of Environmental Quality (ADEQ)	Accepted
Arizona Department of Public Safety (ADPS)	Accepted
Arizona Department of Water Resources (ADWR)	Followed up on 10/14/16 (phone); No Response
Arizona Game and Fish Department (AGFD)	Requested to be Cooperating Agency
Arizona State Land Department (ASLD)	Accepted
Arizona State Parks (ASP)	Accepted
Arizona State Historic Preservation Office (SHPO)	Accepted
Regional	
Central Arizona Governments (CAG)	Accepted
Central Yavapai Metropolitan Planning Organization (CYMPO)	Accepted
Northern Arizona Council of Governments (NACOG)	Followed up on 10/17/16 (phone); No Response
Maricopa Association of Governments (MAG)	Accepted
Pima Association of Governments (PAG)	Accepted
SouthEastern Arizona Governments Organization (SEAGO)	Accepted
Sun Corridor Metropolitan Planning Organization (SCMPO)	Accepted
County	
Maricopa County	Accepted
Flood Control District of Maricopa County	Accepted
Pima County	Accepted



Agency	Response to Invitation
Pima County Flood Control	Accepted
Pinal County	Accepted
Pinal County Flood Control District	Accepted
Santa Cruz County	Accepted
Santa Cruz County Flood Control District	Followed up on 10/17/16 (phone) and (email); No Response
Yavapai County	Accepted
Yavapai County Flood Control	Accepted
Local	
City of Buckeye	Accepted
City of Casa Grande	Accepted
City of Eloy	Accepted
City of Goodyear	Accepted
City of Maricopa	Accepted
City of Nogales	Accepted
City of South Tucson	Accepted
City of Surprise	Accepted
City of Tucson	Accepted
Town of Gila Bend	Accepted
Town of Marana	Accepted
Town of Oro Valley	Accepted
Town of Sahuarita	Accepted
Town of Wickenburg	Accepted
Utility	
Arizona Public Service (APS)	Followed up on 10/17/16 (phone) and (email); No Response
Buckeye Water Conservation and Drainage District	Followed up on 10/17/16 (phone); No Response
Central Arizona Irrigation and Drainage District	Accepted
Central Arizona Project (CAP)	Followed up on 10/17/16 (phone); No Response
Cortaro-Marana Irrigation District	Accepted
Greene Reservoir Flood Control District	Accepted
Maricopa Flood Control District	Accepted
Maricopa-Stanfield Irrigation and Drainage District	Followed up on 10/18/16 (phone); No Response
Roosevelt Irrigation District (RID)	Followed up on 10/18/16 (phone); No Response
San Carlos Irrigation and Drainage District (SCIDD)	Accepted
Salt River Project (SRP)	Accepted
Trico Electric Cooperative	Accepted
Silverbell Irrigation and Drainage District	Followed up on 10/18/16 (phone) and (email); No Response

Agency	Response to Invitation
UNS Energy Corporation/Tucson Electric Power (TEP)	Accepted
Tribal	
Ak-Chin Indian Community	Accepted
Gila River Indian Community	Followed up on 11/17/16 (email); No Response
Pascua Yaqui Tribe	Accepted
Tohono O’odham Nation	Followed up on 11/14/16 (email); Response pending Tribal Council approval

3.2 Agency Scoping Meetings

Three agency scoping meetings were held to solicit comments from agencies invited to participate in the environmental review process for the I-11 Corridor. The three agency scoping meetings were held along the Corridor Study Area in Phoenix, Casa Grande, and Tucson. Details on the meeting dates, times, locations, and attendance are presented in **Table 3-3** (Agency Scoping Meetings).

Each agency scoping meeting included a presentation by ADOT staff, followed by a facilitated session to elicit questions and comments. **Figure 3-1** (Agency Scoping Meeting in Tucson) shows the participants receiving the presentation at one of the agency scoping meetings in Tucson. In addition to poster boards displayed throughout the room, agency participants were given a fact sheet that compared a programmatic Tier 1 EIS versus project level Tier 2 environmental reviews in order to explain the process. A webinar was available for agency staff unable to attend the meetings in person. The agency scoping meeting materials are provided in **Appendix C** (Agency Scoping Meeting Materials), with the sign-in sheets in **Appendix D** (Agency Scoping Comments).

Table 3-3 Agency Scoping Meetings

Meeting Date and Time	Location	Agencies Represented	Agency Staff Attended
Phoenix June 7, 201 1:30 PM to 3:30 PM	Leadership and Employee Engagement Conference Room 2739 East Washington Street, Phoenix, AZ	9 ⁽¹⁾	16
Casa Grande June 8, 2016 1:30 PM to 3:00 PM	Dorothy Powell Senior Adult Center, Dining Room 405 East 6th Street, Casa Grande, AZ	5 ⁽²⁾	10
Tucson June 22, 2016 10:00 AM to 11:30 AM	Pima Association of Governments, Large Conference Room 1 East Broadway Boulevard #401, Tucson, AZ	9 ⁽³⁾	21
TOTAL		23	47

NOTES:

- (1) ADEQ, ASLD, BLM, Goodyear, Maricopa County, Maricopa County Flood Control District, Pinal County, Reclamation, and SHPO.
- (2) Casa Grande, Eloy, Maricopa, SCMPPO, and Tohono O’odham Nation.
- (3) ASP, CBP, Marana, NPS, PAG, Pima County, SHPO, Tucson, and USFS.



Figure 3-1 Agency Scoping Meeting in Tucson

3.3 Agency Scoping Comments

This section summarizes the agency scoping input received verbally at the agency scoping meetings, as well as the written comments that were submitted by the agencies. Copies of the agency scoping meeting notes and written comments submitted by the agencies and tribal governments are provided in **Appendix D** (Agency Scoping Comments).

A summary of the agency scoping comments and information received during scoping are also depicted on **Figure 3-2** (Agency Scoping Feedback on Corridor Alternative Preferences) through **Figure 3-5** (Agency Scoping Feedback in North Section).

Data or comments received post-scoping is not reflected on the summary maps, but will be taken into consideration for subsequent study phases (e.g., developing and screening corridor alternatives).

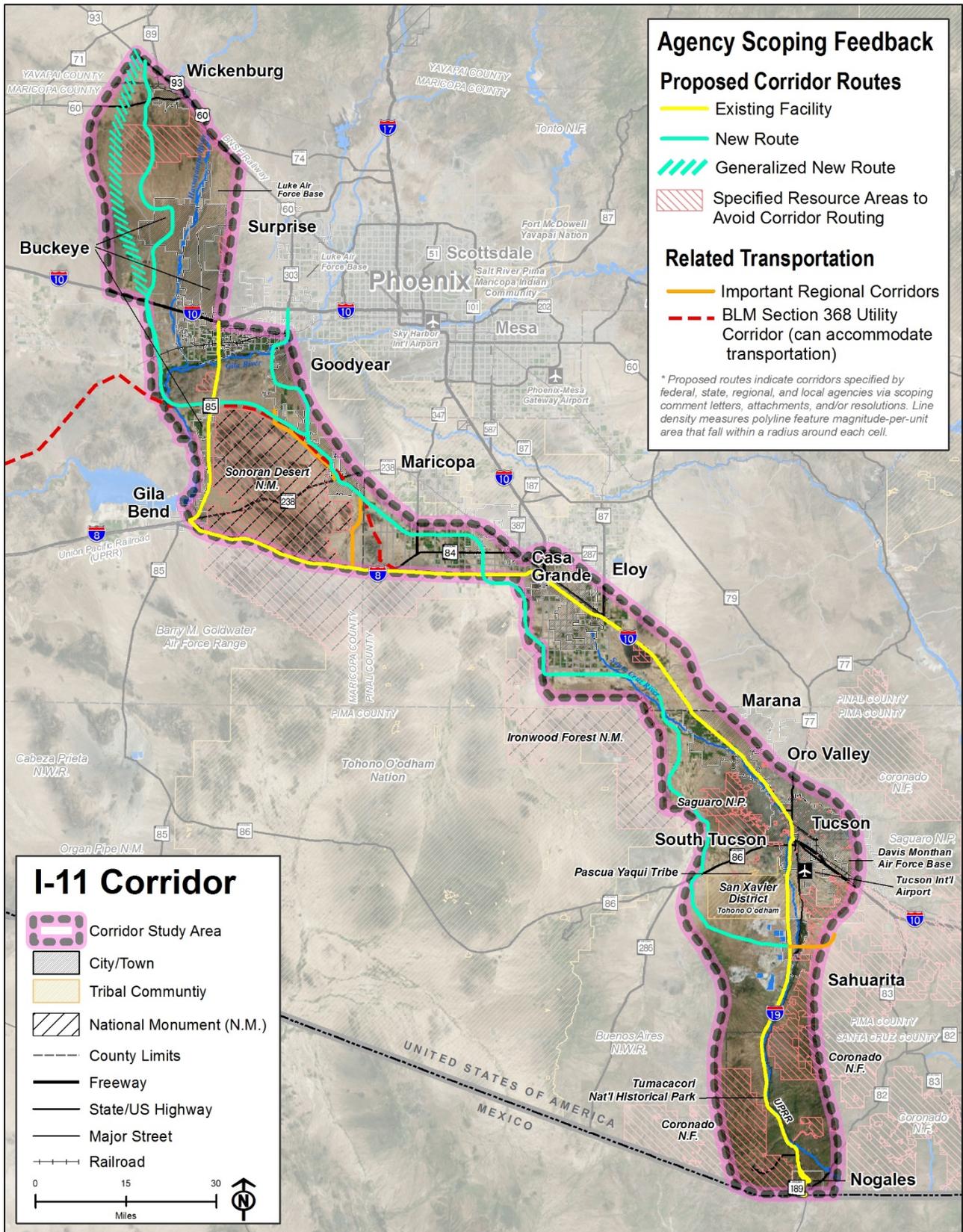


Figure 3-2 Agency Scoping Feedback on Corridor Alternative Preferences

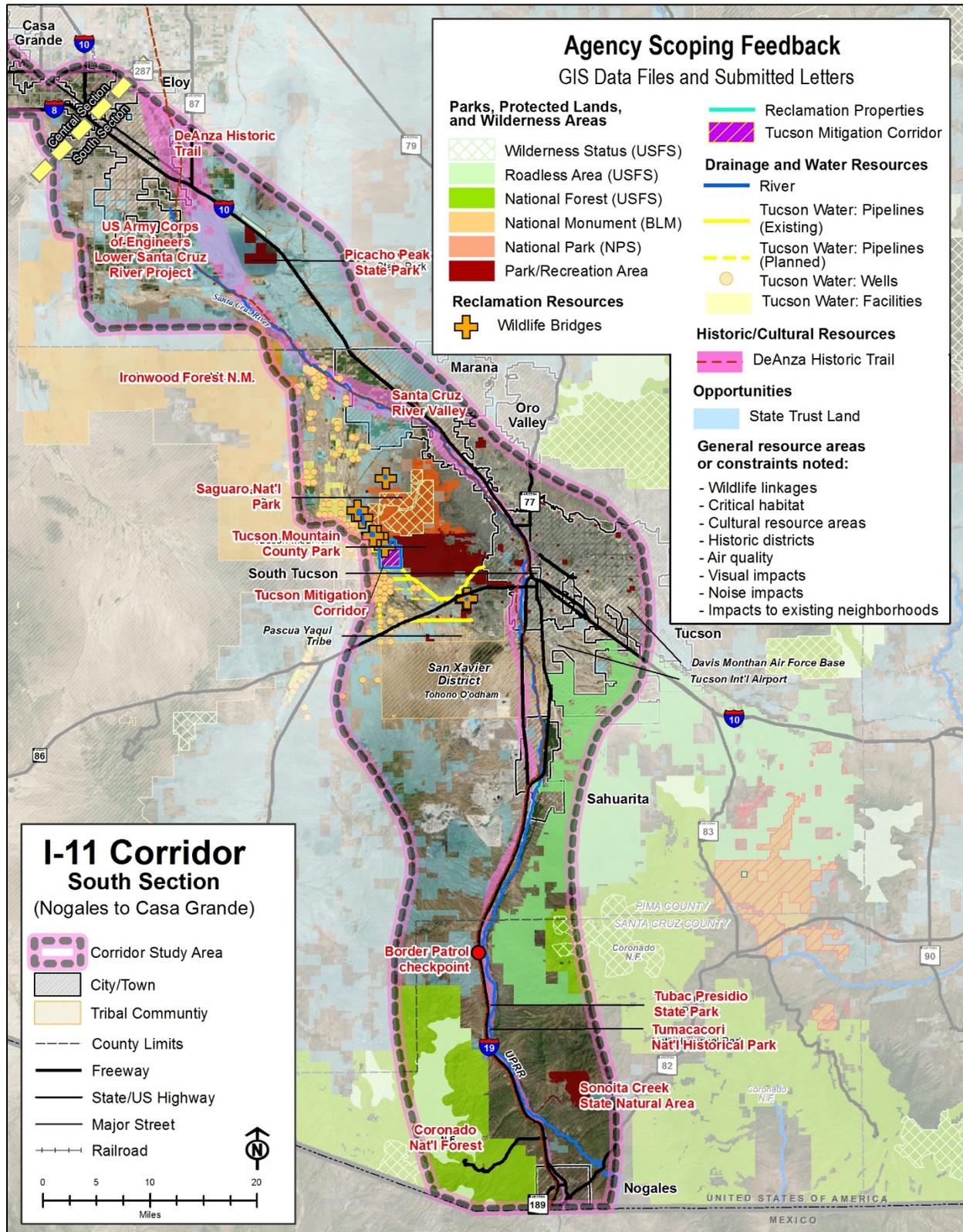


Figure 3-3 Agency Scoping Feedback in South Section

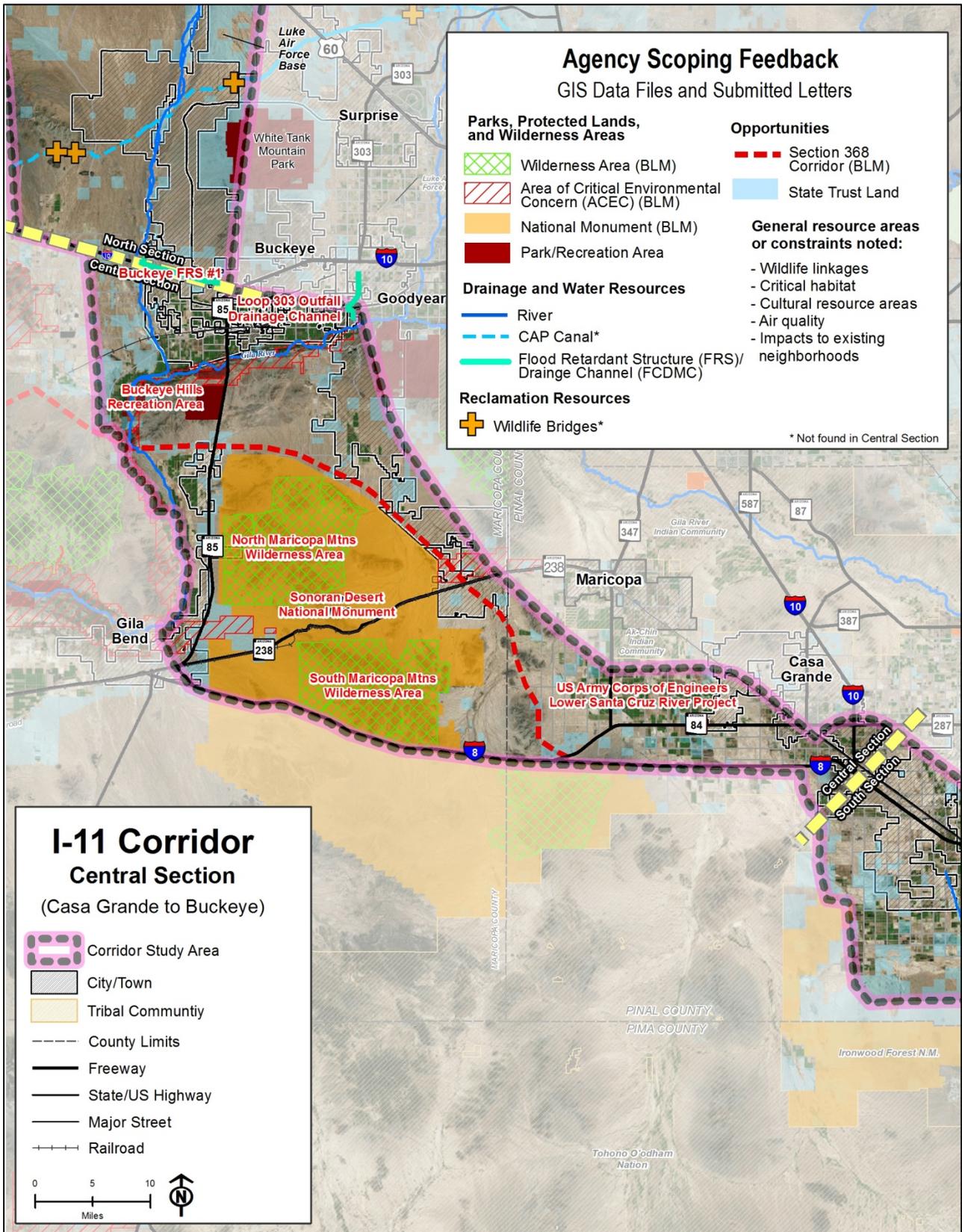


Figure 3-4 Agency Scoping Feedback in Central Section

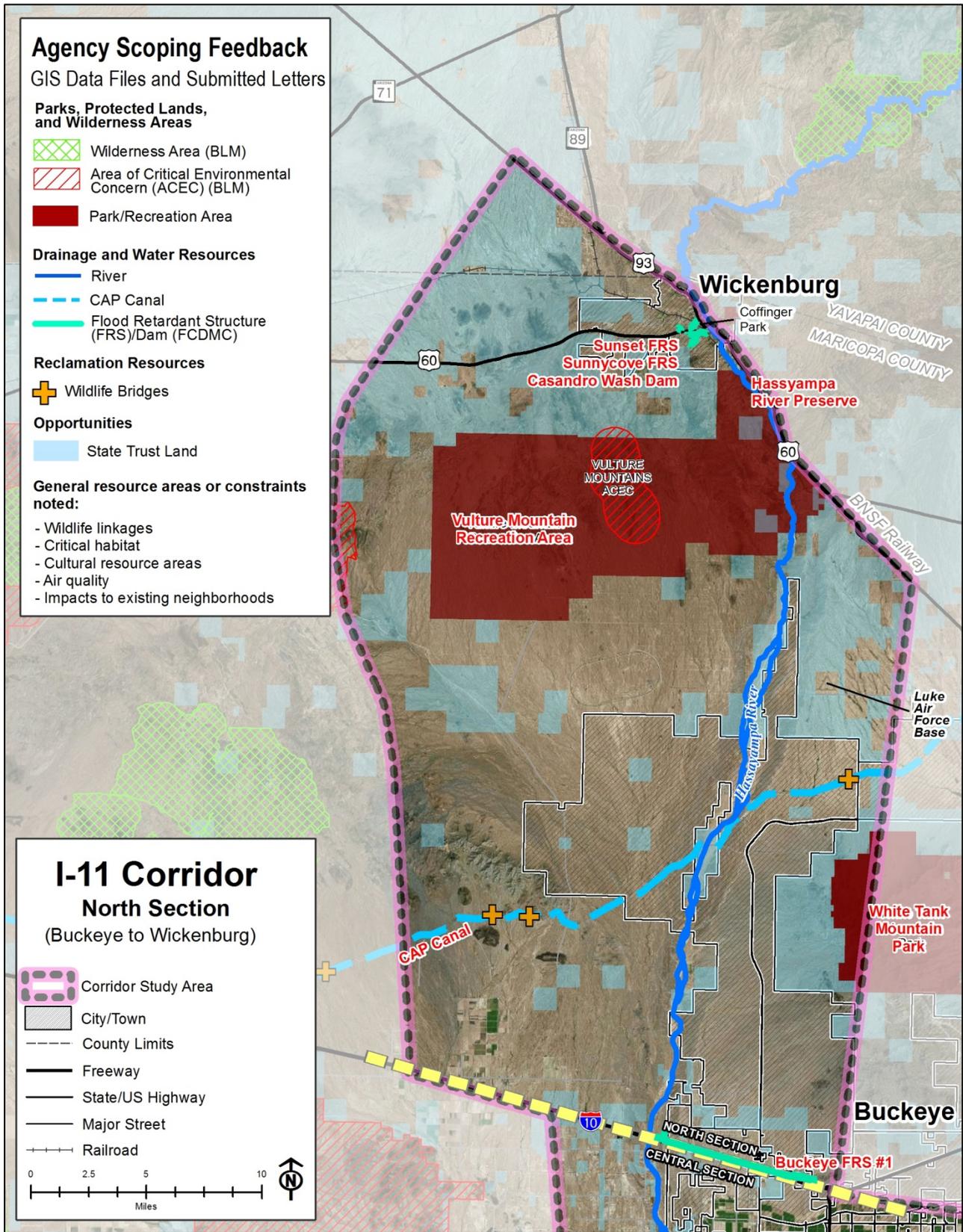


Figure 3-5 Agency Scoping Feedback in North Section

3.3.1 Overview of Agency Comments

The written and verbal comments received from the agencies and tribal governments involve common themes on potential corridor alternatives, environmental resources, and other issue areas. Following is an overview of these common themes, with details from each individual agency provided thereafter:

- Prefer corridor alternatives on existing freeways versus new corridors
- Develop a reasonable range of alternatives and consider a multimodal corridor
- Ensure consistency with existing and proposed local and regional plans, environmental documents, and master planned community plans
- Incorporate the highest levels of environmental design and energy efficiency
- Develop project purpose and need
- Study opportunities to foster economic development
- Protect environmentally-sensitive resources:
 - Parklands, preserves, and recreation areas
 - Historic and archaeological resources
 - Wildlife habitat, corridors, and wilderness areas
 - Endangered species and critical habitat
 - National forests and “roadless areas”
 - Water resources and flood control structures
 - Air quality
 - Noise impacts
- Consider cumulative impacts and growth-related indirect impacts, including impacts to:
 - Local traffic and access
 - Residents and businesses, including displacement of communities and downtown areas
 - Local economic development
 - Environmentally-sensitive resources
- Assess impacts to environmental justice communities
- Maintain connectivity between regional trails and parks
- Consider general support for the project as a critical multimodal facility for the region
- Provide early and frequent coordination with agencies and tribal communities.

3.3.2 Summary of Individual Agency Comments

Arizona Department of Environmental Quality

- I-11 Corridor passes through nine air quality non-attainment areas and one Class 1 area included in the Arizona Regional Haze Federal Implementation Plan; addition of idling vehicular traffic (diesel fumes) could impact the mitigation measures underway.
- **Figure 3-6** (Agency Scoping Feedback from ADEQ) shows the resource information and data provided by the ADEQ.

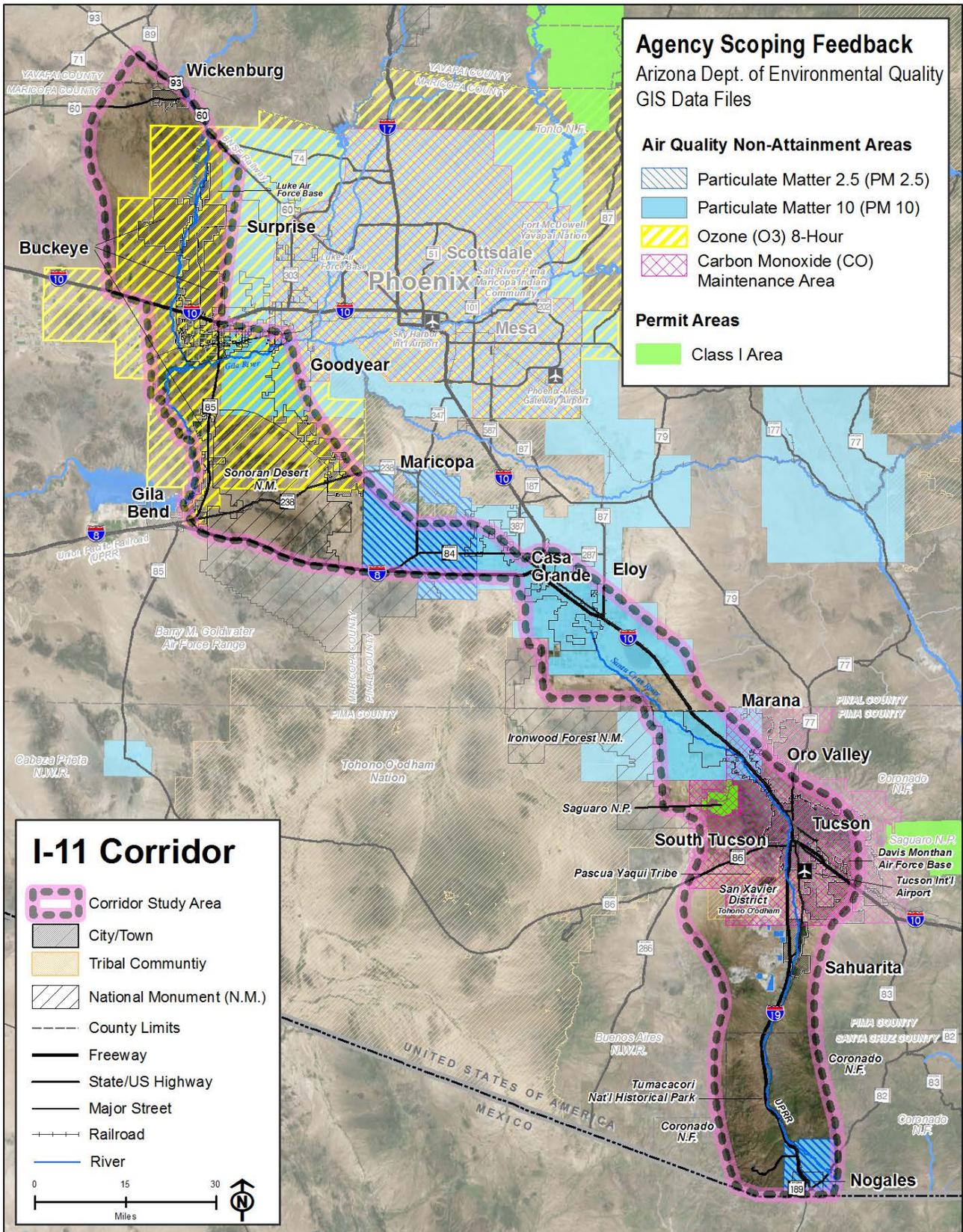


Figure 3-6 Agency Scoping Feedback from ADEQ



Arizona Game and Fish Department

- Requested Cooperating Agency status based on jurisdictional authority and state trust responsibility under Title 17 of the Arizona Statutes for the management of Arizona’s wildlife resources; AGFD has expertise in, and an understanding of, Arizona’s wildlife and wildlife related issues such as habitat connectivity.
- Seeks to assist in identifying potentially affected resources, evaluating impacts, and developing alternatives and mitigation strategies, specifically related to wildlife resources and habitat, habitat connectivity, and AGFD lands managed as wildlife areas.
- **Figure 3-7** (Agency Scoping Feedback from AGFD) shows the resource information and data provided by the AGFD.
- Provided comments regarding potential direct, indirect, and cumulative impacts to wildlife, wildlife habitat, and wildlife related recreation along the I-11 Corridor Study Area. Identified potential impacts to sensitive resources, as well as potential data needs and mitigation opportunities for consideration. General comments relating to the entire study area include:
 - Wildlife Movement: Transportation infrastructure compromises the natural movement of mammals, reptiles, and amphibians, and to some extent birds.
 - Wildlife: Several species federally listed under the Endangered Species Act (ESA), as well as their proposed and designated critical habitats occur within the Corridor Study Area.
 - Wildlife Habitat: AGFD’s policy seeks compensation at a 100 percent level, when feasible, for actual potential habitat losses resulting from land and water projects; recommends all impacts to habitat be mitigated in-kind through a combination of on-site impact avoidance and/or minimization when feasible, and off-site preservation, creation, or compensation.
 - Wildlife-Related Recreation: Several local, state, and federal parks/open space areas occur within the Corridor Study Area such as Saguaro National Park, Sonoran Desert National Monument, proposed Vulture Mountains Cooperative Recreation Management Area, White Tank Mountains Regional Park, Estrella Mountain Regional Park, and numerous AGFD-owned/managed Wildlife Areas. Maintaining access to wildlife recreation opportunities throughout the I-11 Corridor is imperative.
 - Development: The cumulative impact of developing new transportation infrastructure through rural lands will have the effect of a catalyst for urban, suburban, and exurban development.
- In the North (Buckeye to Wickenburg), an Interstate/multimodal corridor would be incompatible with a county, state, or federal park/recreation area, including the proposed Vulture Mountains Cooperative Recreation Management Area. The Hassayampa River Preserve is situated immediate adjacent (and parallel to) the US 60 between the Vulture and Wickenburg Mountains; expansion of the existing US 60 highway into an Interstate/multimodal corridor will increase edge effects to the Hassayampa River Preserve. AGFD has been working with Buckeye and Surprise to preserve undeveloped linkages between the White Tank Mountains, Hassayampa River Corridor, Belmont/Bighorn Mountains and Vulture Mountains.

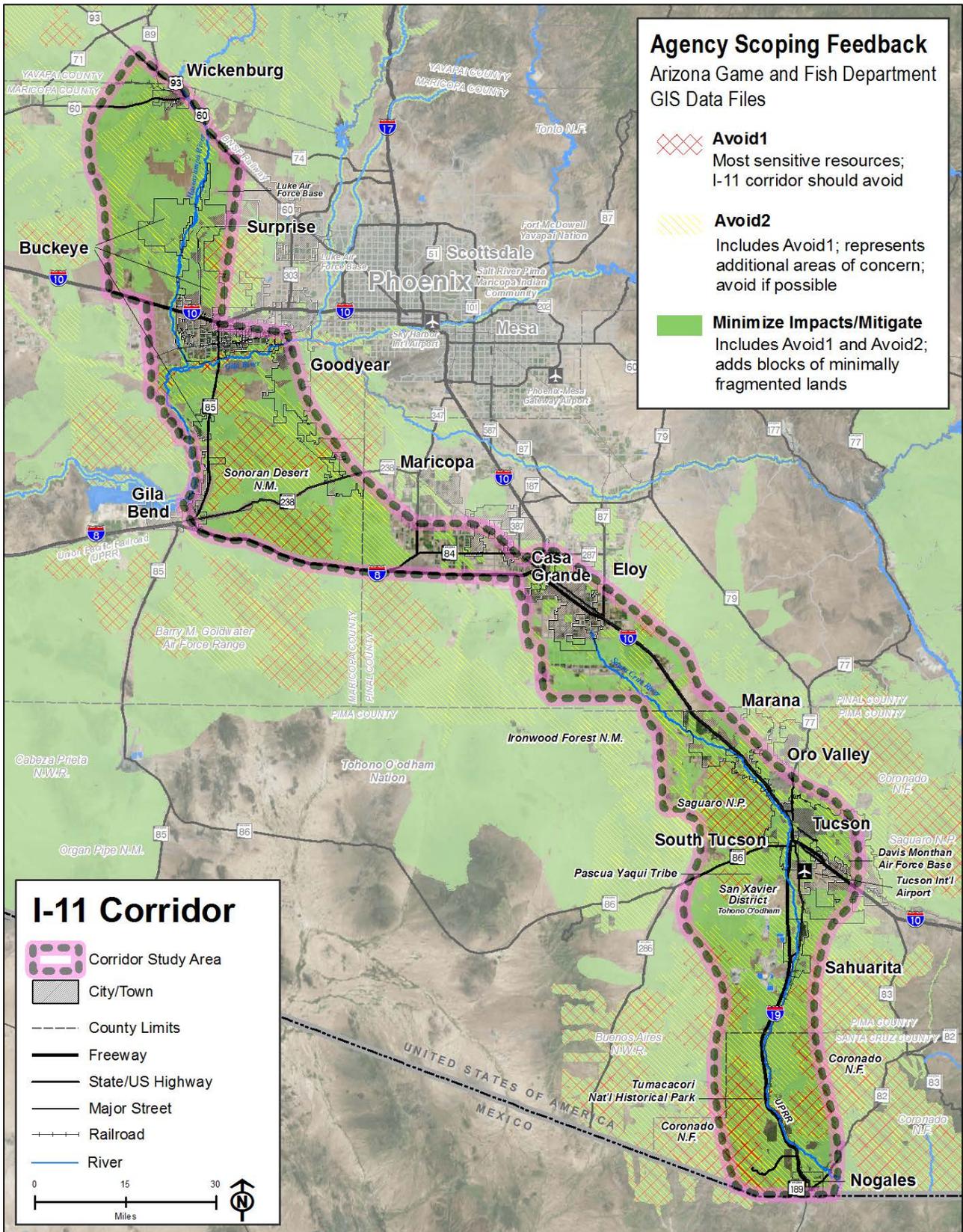


Figure 3-7 Agency Scoping Feedback from AGFD

Arizona Game and Fish Department (continued)

- In the Central (Casa Grande to Buckeye), the Gila River is host to large numbers of waterfowl and other migratory bird species, as well as other key wildlife species; it is an important wildlife linkage/movement area and has been designated an Important Bird Area by the National Audubon Society. AGFD owns and/or manages multiple wildlife areas along the Gila River, including but not limited to Arlington, Powers Butte, Robbins Butte, Base and Meridian; and collectively known as the Lower Gila River Wildlife Area complex. Wildlife species currently move freely back and forth between the Maricopa Mountains of the Sonoran Desert National Monument and Estrella Mountains. AGFD has been working with BLM, ADOT, and other municipalities to develop strategies and commitments to consider a proposed wildlife habitat linkage design across Rainbow Valley.
- In the South (Nogales to Casa Grande), I-10 between Casa Grande and Tucson poses a significant barrier to east-west wildlife movement in the region; maintaining existing movement linkages between large habitat blocks west of I-10 is paramount. Any alignment west of I-10 would result in further fragmentation, and thus, would have significant impacts to wildlife connectivity, including contributing to cumulative effects to wildlife movement in the region. In 2007, the Arizona Game and Fish Commission took a unanimous position of opposition to all routes for the proposed I-10 bypass, which included a route through Avra Valley. The mitigation value of the Tucson Mitigation Corridor would be severely compromised by construction and operation of an Interstate/Multi-Modal corridor. South of Tucson along I-19, a number of biologically diverse mountain ranges (i.e., sky islands) and riparian habitats east and west of I-19 are host to a number of endemic and/or rare species. AGFD has been working with BLM, ADOT, PAG, and other agencies/stakeholders to develop strategies and commitments to implement wildlife linkage designs connecting the sky islands and desert valleys.

Arizona State Land Department

- State Trust land is located extensively throughout the I-11 Corridor; views the I-11 Corridor as a great opportunity to strengthen the economy and generate economic development for the Trust beneficiaries and State of Arizona.

Arizona State Parks

- Several state parks are located within the I-11 Corridor (e.g., Sonoita Creek Natural Area, Patagonia Lake State Park, Tubac Presidio State Historic Park, and Picacho Peak State Park).
- Prefers that I-11 not traverse any parklands; however, values the potential improvement in access to state parks from existing or planned transportation corridors, such as providing proximate exits, access roads, or signage.
- Prefers avoiding Picacho Peak State Park by keeping any alignment expansions east of the existing interstate.
- Prefers that the Vulture Mountains Cooperative Recreation Management Area is avoided by keeping any proposed alignments westward towards the existing power line alignment; Off-Highway Vehicle usage is a popular activity in this area and provides a positive economic impact to the local area and state.



Bureau of Indian Affairs

- Consult with potentially affected tribes for cultural purposes, as well as independent governments and landholders that may be impacted directly or indirectly by the proposed corridor. BIA cannot grant new right-of-way without tribal consent.
- Concern regarding limiting access to reservation lands.

Bureau of Land Management

- Corridor Study Area passes through three BLM field offices (i.e., Hassayampa, Lower Sonoran, and Tucson), as well as includes two BLM-administered national monuments (i.e., Sonoran Desert and Ironwood Forest).
- In the north section, a route using US 60 would avoid the 70,000-acre Vulture Mountains Cooperative Recreation Management Area and most BLM specially designated areas and natural resource conflicts. A western route would do the same, and also avoid traversing the Black Butte Area of Critical Environmental Concern (ACEC) and provide an alternate route for analysis.
- In the central section, the Sonoran Desert National Monument should be avoided. I-8 currently traverses the monument. Utilizing this existing portion of I-8, generally between Casa Grande and Gila Bend, may be a viable corridor alternative for analysis. However, adding additional infrastructure, including a wider highway or other multimodal features would be incompatible with the national monument and wilderness designations. An alignment in the western edge of the Corridor Study Area from I-8 in the Gila Bend area on SR 85 to I-10 would take advantage of existing transportation corridors and avoid significant impacts to the national monument and additional BLM-administered lands and natural resources. An alternative to the north of the national monument could be viable and should consider previously studied corridors (e.g., Goodyear's Sonoran Parkway), designated wildlife corridors, existing rights-of-way, and a permitted, but not yet built solar energy facility.
- In the south section, the BLM is concerned with overlap or adjacency to the Ironwood Forest National Monument, which is valuable from recreational, cultural and archeological, and biological perspectives. Any new I-11 Corridor should also not impact current access roads to the monument. Other important resources in the area include the Los Robles Archaeological District and archeological sites along the Santa Cruz and Greens Reservoir drainages. Another important cultural resource is the Indian Kitchen area near Helmet Peak.
- Encourages avoidance of Resource Management Plan (RMP) designated wildlife movement corridors and wildlife habitat management areas.
- Corridor Study Area also includes the Juan Bautista de Anza National Historic Trail from Nogales through the Sonoran Desert National Monument.
- Other resources and designations to consider include RMP designations for visual resource management, recreation and travel management, and specially-designated areas.

City of Buckeye

- Stated corridor routing preferences and parameters, including a desire not to pursue a corridor east of the White Tank Mountains; not to co-locate an I-11 Corridor with State Route (SR) 85 (capacity of two corridors are necessary); and a preference for the MAG Hassayampa Freeway route, which is reflected in the City of Buckeye's planning and development activities.

City of Eloy

- Prefers to locate the I-11 Corridor along the West Pinal Freeway alignment, as documented in the Pinal Regional Transportation Plan and resolution adopted by the Eloy City Council on June 27, 2016.

City of Goodyear

- EIS for the Sonoran Valley Parkway Project in Goodyear should provide valuable information regarding potential impacts that may be pertinent to the I-11 Corridor.
- City of Goodyear has several adopted planning documents that should be consulted; the *Goodyear 2025 General Plan (2014)* and *Transportation Master Plan (2014)* express the City of Goodyear's preference for freeway alignments through the city.
- Agrees that the I-11 Corridor is a critical piece of multimodal infrastructure that is vital to the future development of the southwest region of the US.

City of Maricopa

- Prefers to locate the I-11 Corridor along the West Pinal Freeway alignment, as documented in the Pinal Regional Transportation Plan, MAG Hidden Valley Framework Study, and resolution adopted by the Maricopa City Council on June 21, 2016.

City of Tucson

- Comments on the scope pertain to the alternatives to be studied and impacts to be evaluated; cited relevant policies from *Plan Tucson: City of Tucson General and Sustainability Plan (2013)* to provide additional context.
- Requests that the Tier 1 EIS consider innovative approaches to alternatives that co-locate I-11 approximately within existing freeway rights-of-way for I-10 and I-19 (including frontage roads); developing an interstate within already disturbed areas has the potential to have fewer impacts, but any alternatives along existing facilities in the urban area need to study a smaller than 2,000-foot-wide study area.
- An innovative approach, such as a Collector-Distributor system, would separate local and through traffic; it has the potential to greatly facilitate freight movement without adding as much physical infrastructure (i.e., lanes) and also provide a consistent approach along I-10 through the City of Tucson.
- While the overall economic impact of any roadway alternative would need to be verified by formal economic impact study, the initial economic development impact of I-11 (any alternative) to the City of Tucson would be the creation of construction jobs and businesses supporting the construction industry, as well as support the Port of Tucson.
- There are community and economic development pros and cons to co-locating the freeway versus bypassing the Tucson metropolitan area; impacts to adjacent businesses, sales tax revenue, tourism and neighborhoods should be explored in both instances.
- Alternatives that traverse Avra Valley should consider impacts to city-owned water facilities; an alignment through Clearwater could present significant challenges to the utility's operations, and there could be significant costs in the event that Tucson Water infrastructure was required to be moved in order to make way for a new Interstate.
- Other considerations include Habitat Conservation Plan, water quality concerns, Tucson-Phoenix water exchange, water rights, and restrictive covenants.



Federal Aviation Administration

- Primary concerns relate to the potential impacts of the I-11 Corridor on federally-obligated airports and their operations.

Federal Railroad Administration

- Potential need for additional rail connections in southern portion of study area.

Maricopa Association of Governments

- Consider completed studies within the Corridor Study Area that include an interconnected transportation system of arterials, parkways, and a proposed I-11 Corridor; requests that the following past planning efforts in the Corridor Study Area be evaluated in the Tier EIS:
 - *I-10/Hassayampa Valley Regional Transportation Framework Study* (MAG 2008)
 - *I- 8 and I-10 Hidden Valley Regional Transportation Framework Study* (MAG and CAG 2009)
 - *Hassayampa Framework Study for the Wickenburg Area* (Wickenburg 2010).

Maricopa County

- Comments compiled from the Maricopa County Departments of Transportation, Parks and Recreation, and Flood Control District.
- Consider potential impacts near Vulture Mine Road:
 - Vulture Mine Road is a regional roadway carrying vehicles from I-10 to Wickenburg. Impacts to this roadway may cause concern to local traffic
 - Concerns regarding transportation impact to Vulture Mountains Cooperative Recreational Management Area
 - Coordination needed with approved circulation plans of multiple master planned communities
 - Topography in this area is diverse and may require special considerations
 - Wildlife activity is high resulting in concerns with wildlife connectivity
 - Planned Maricopa Regional Trail will connect Lake Pleasant Regional Park to Vulture Mountains and Wickenburg area from the east, turning south to connect to White Tank Mountain Regional Park.
- Consider potential impacts near US 60 and future Turner Parkway:
 - Potential wildlife impact to the Hassayampa Preserve
 - Potential impact to existing communities (e.g., Festival Ranch)
 - Potential impact to wildlife corridors traversing to and from the White Tank Mountains.
- Consider potential impacts to floodplains and flood control structures:
 - Impacts to flood retardant structures (FRS) and dams, including Buckeye FRS #1, Sunset FRS, Sunnycove FRS, and Casandro Wash Dam
 - Impact to Loop 303 Outfall Drainage Channel located in City of Goodyear
 - Potential floodplain impacts within unincorporated Maricopa County and Buckeye, Surprise, Goodyear, Gila Bend and Wickenburg.
- Consider potential impacts on air quality.

National Park Service

- Concerns regarding a new I-11 Corridor adjacent to western boundary of Saguaro National Park, Casa Grande Ruins National Monument, and Tumacácori National Historical Park.

- Tucson Mountain District of Saguaro National Park is 24,000 acres, over half of which is designated Wilderness. Due to encroachment from the expanding urbanization of Tucson, coupled with geographic isolation, it is an ongoing challenge for the NPS to maintain the park's native biodiversity. The west side of the Tucson Mountain District is still quite remote. Wildlife species and their contribution to the biodiversity of the park are dependent on their access to a range of habitat values across a broad landscape. Fragmenting features, such as large road systems, can deny them access to habitat and resources by severing movement corridors between and within required habitat.
- Concerned that a multi-purpose corridor bisecting the Avra Valley would irreparably degrade areas near and within the Saguaro National Park, potentially leading to impairment of the resource values for which the park was established.
- Because of concerns about potential impacts to designated wilderness and other values at Saguaro National Park, the NPS is requesting that studies be conducted to quantify and illustrate the impacts a route through the Avra Valley would have, prior to identifying a Preferred Corridor Alternative in the Draft Tier 1 EIS. Specifically, NPS is interested in understanding potential changes to: air quality, natural sound, viewsheds, night skies, and the spread of invasive plants.
- Juan Bautista de Anza National Historic Trail is adjacent to/contains the Anza recreation retracement route (i.e., recreation trail) and Auto Route. A new segment of highway could potentially impact established Anza Recreation Trail, Anza Auto Tour Route, and visual settings and landscape character of the Santa Cruz River valley and Sonoran Desert.
- There are 11 National Historic Landmarks (NHL) located near the proposed area of potential effect for the I-11 Corridor: Gatlin Site, Pueblo Grande Ruins and Irrigation Sites, Taliesin West, Ventana Cave, Desert Laboratory, San Xavier del Bac Mission, Snaketown, Mission Los Santos Angeles de Guevavi, Tumacácori Museum, San Cayetano de Calabazas, and Jerome Historic District. To the maximum extent possible, efforts should be made to minimize any potential direct and indirect impacts

Pima Association of Governments

- Recognizes importance of I-11 Corridor for trade, economic development, economic expansion, and mobility; they will support their member agencies during this study process.
- On February 14, 2014, PAG Regional Council adopted a resolution supporting further study of the Southern Arizona Connectivity Segment's Alternative C through eastern Pima County as identified as part of the IWCS; this alternative travels through the Tucson region to connect to Mexico at Nogales.

Pima County

- In 2013, Pima County developed a conceptual route for the I-11 Corridor through Avra Valley west of Tucson, as documented in their Preliminary GIS-Based Roadway Alignment and Impact Study. This route connects to I-19 near the Town of Sahuarita and continues west and north to the Pima/Pinal County line near Pinal Air Park. Pima County sought to:
 - Demonstrate that a potential route exists through this undeveloped region rather than using the existing I-19 and I-10 corridors, which are congested and have limited expansion potential, especially near downtown Tucson; and
 - Minimize social and environmental impacts and analyzed impacts to land use, land ownership, cultural and environmental resources, and utilities.



- Pima County supplemented their initial scoping comments and 2013 study with the following additional comments:
 - Understand that for all practical purposes, there are two general routes through Pima County: one following the existing I-19 and I-10 corridors; and a second alignment west of the City of Tucson through Avra Valley. Pima County fully supports the complete disclosure of all impacts – social, economic, and environmental – for any alternative, including “no-build” option.
 - Potential alignment in Pima County’s 2013 study should be evaluated in the I-11 Corridor Tier 1 EIS; understand a high-speed, high-capacity roadway through Avra Valley would have both positive and negative impacts.
 - If the Tohono O’odham Nation requests an alignment through the easternmost extent of their lands (i.e., the Garcia Strip), impacts to residential areas closer to Sandario Road in Avra Valley could be reduced, though some residential impacts further south would remain. It could also avoid the Bureau of Reclamation wildlife corridor on the east side of Sandario Road.
 - Concerns about a routing option that relies only on improvements to the existing interstate routes. Even with a collector-distributor type concept, may not offer sufficient capacity to serve future anticipated truck and freight traffic, and adding such capacity would undoubtedly involve laterally expanding the existing interstate roadway footprint through the heavily developed downtown segment.

Pima County Regional Flood Control District

- The district will assist in the identification of impacts and issues with respect to floodplains, riparian habitat, and other resources managed by the district.

Pinal County

- Pinal County Board of Supervisors adopted a resolution declaring support for the I-11 Corridor Tier 1 EIS on July 7, 2016. Within the resolution, Pinal County declares support for the West Pinal Freeway along the route identified in the Pinal Regional Transportation Plan.
- As stated at the Agency Scoping Meeting in Phoenix, Pinal County is updating its Regionally Significant Routes for Safety and Mobility (RSRSM) study. The update of the Long-Range Transportation Plan is due in November 2016. This includes several high-capacity transportation routes that the I-11 team should be aware of, including a preferred West Pinal Freeway route for the I-11 Corridor, which is also documented in the Pinal Regional Transportation Plan.

San Carlos Irrigation and Drainage District

- SCIDD maintains canals and laterals in central Pinal County. Any crossing of these canals will require engineering review and construction oversight by SCIDD approved irrigation engineers.

Salt River Project

- SRP has infrastructure related to power generation, transmission and distribution delivery systems, as well as water delivery systems within the Corridor Study Area.

State Historic Preservation Office, Arizona State Parks

- Strongly recommends including interested Native American Tribes in the selection of alternatives. This can be achieved, in part, through ethnographic studies completed early in the Tier 1 process to obtain Tribal perspectives about the transportation corridor, rather than later as mitigation to resolve adverse effects of the undertaking to resources and places of traditional cultural value.

- Recommends that a full Class I inventory of the I-11 Corridor, as currently defined, be completed as part of the ASR and Tier I EIS.
- Advocates for preservation of National Register of Historic Places (NRHP) -eligible and listed resources by using existing infrastructure, where possible, rather than new construction.

Sun Corridor Metropolitan Planning Organization

- SCMPO Executive Board approved a resolution on July 5, 2016, which declares support for the West Pinal Freeway along the route identified in the Pinal Regional Transportation Plan; provides a high capacity route that promotes freight movement, links communities, and strengthens economic development and job growth county-wide.

Town of Marana

- Concerned about an I-11 Corridor that would coincide with existing interstate routes within developed urban and suburban areas such as Tucson and Marana. Marana's downtown was displaced by the creation of I-10 in the 1960s. Undeveloped areas of I-19, I-10 and I-8 could be expanded to provide an I-11 need but developed areas of Tucson/Marana and Casa Grande should utilize different corridors, which could form outer loops to these communities.
- Does not support an alignment on eastern side of I-10 as such a corridor would place the alignment in the Tortolita Fan. Due to Marana's concerns about an eastern alignment and impact of an I-10 alignment through the urban/suburban core, they only favor a western bypass alignment near their jurisdiction, as shown on **Figure 3-2** (Agency Scoping Feedback on Corridor Alternative Preferences).
- Worked with PAG to define major arterial corridors that could ultimately tie into an I-11 route that passes west of Marana. These corridors are Pinal Airpark, Marana Road, and Avra Valley Road. Marana does not envision any other east-west arterials extending to a potential I-11.
- Prefers corridors that can be served by municipal services to ensure the ultimate I-11 Corridor triggers local economic development.
- Santa Cruz River is not well defined northwest of Marana, which may cause design challenges.

Town of Sahuarita

- Requests consideration of connecting an I-11 Corridor to I-19 at El Toro Road, as shown on **Figure 3-2** (Agency Scoping Feedback on Corridor Alternative Preferences). El Toro Road was designated as a Key Commerce Corridor by the Town of Sahuarita on March 28, 2016; this connectivity is consistent with findings in the *State Transportation System Mobility and Regional Circulation Needs Feasibility Study* (PAG 2006), *Regionally Significant Corridors Study* (PAG 2014), and *Major Streets and Routes Plan Policy Manual* (Sahuarita 2015).
- *Aspire 2035: Sahuarita's General Plan* (2035) is supportive of improving mobility of people of goods, especially as a factor to support economic viability of the area, increase safety, and improve accessibility; associated policies include planning and designing the transportation system to accommodate international trade corridors such as the CANAMEX and Sun Corridors.

Town of Wickenburg

- Council's consensus is that an I-11 Corridor must serve as a complement to Wickenburg's existing transportation network, furthering opportunities for economic development on the west end of town near its intersection with US 60, rather than function effectively as a third bypass of the community.

- SR 74 extension shown in MAG's Hassayampa Framework Study should be removed from consideration. The present US 60/93 alignment through Wickenburg should continue to be the preferred route for leisure travelers. I-11, conversely, should be the preferred route for the movement of commercial goods and serve as Arizona's leg of the CANAMEX corridor.
- ADOT is to be commended for its quick organization of business community meetings and Wickenburg encourages more such opportunities to be made available as the study evolves. Frequent communication with stakeholders is essential for successful project delivery, especially for a project that will have a significant impact on Wickenburg business owners.
- On May 19, 2014, the Town Council voted to formally endorse Alternative G/H/LL/MM (new corridor) and oppose Alternative I (extension of Sun Valley Parkway). Alternative G/H/LL/MM provides Wickenburg with the most opportunities to enhance its economic base and maintain its quality of life, as shown on **Figure 3-2** (Agency Scoping Feedback on Corridor Alternative Preferences). Alternative I would cause irreparable harm to Wickenburg's downtown. The amount of right-of-way necessary would require extensive condemnation of homes and businesses along US 60 and US 93.
- Support of Alternative G/H/LL/MM hinges on several factors critical to Wickenburg's future:
 - Minimal impact on Vulture Mountains Regional Park
 - Continued investment in US 60 and US 93
 - Elimination of SR 74 Extension.
- Requested changes to the study area, which can be summarized by augmenting the boundaries to both the west and north; these modifications reflect the comments of many citizens who attended the I-11 public meeting in Wickenburg on June 29, 2016. See **Section 4.3.2** (Map Comments).

US Army Corps of Engineers

- Working on a flood risk management feasibility study of the Lower Santa Cruz River, which is located within the study area. The agencies should share information that will identify and address important issues common to both studies.

US Bureau of Reclamation

- Recommends that the I-11 Corridor Tier 1 EIS evaluate potential impacts on Reclamation's wildlife and plant mitigation preserves, special-status species, and migratory movement of wildlife.
- Tucson Mitigation Corridor was established in 1990 as a commitment made by Reclamation with the USFWS and AGFD in the EIS for the Tucson Aqueduct. A cooperative agreement prohibits any future development within the Tucson Mitigation Corridor other than existing wildlife habitat improvements or developments agreed to by Reclamation, AGFD, and USFWS.
- In order to maintain a functional wildlife movement corridor, Reclamation installed a series of seven CAP canal siphons for approximately \$3 million, which are concrete pipe sections that travel underneath desert washes. Wildlife frequently use desert washes as a means of migrating from one area to another. In March 2016, two desert bighorn sheep were observed using one of the siphon crossings within the Tucson Mitigation Corridor to migrate from the Ironwood National Monument to the Tucson Mountain District of Saguaro National Park. An I-11 corridor through the Tucson Mitigation Corridor or elsewhere within Avra Valley would act as a barrier that would severely restrict or prohibit their movement while also fragmenting habitat.
- Recorded 21 National Register eligible or unevaluated archaeological properties along the CAP. A few of the water oriented archaeological sites are considered Traditional Cultural Properties (TCP) by southern Arizona Tribes.

- Tumamoca Preserves were established by the Reclamation as a conservation measure for the tumamoc globeberry, which is an endangered plant species; the preserve is made up of seven parcels in Avra Valley close to the CAP canal. As a result of that property acquisition and discovery of additional populations in Mexico, the USFWS delisted the tumamoc globeberry. The status of it may require reevaluation by the USFWS if a portion of the preserve network is impacted by future development.
- Corridor Study Area passes through the Hassayampa River Valley between the Belmont and White Tank Mountains; concerned about impacts to local wildlife as it crosses the CAP canal. Reclamation constructed and maintains 24 wildlife bridges strategically placed along the CAP. Placement of I-11 within the valley not only further fragments wildlife habitat and movement along the CAP canal, but reduces wildlife usage and access to the local wildlife bridges.
- Specifically, Reclamation recommends the EIS evaluate the following concerns:
 - Loss of the Tucson Mitigation Corridor as an essential component of a wildlife movement corridor and its impact on desert bighorn sheep movement and other wildlife;
 - Acquisition of other intact wildlife movement corridors as mitigation that would allow Reclamation to maintain its environmental commitments with the USFWS and AGFD;
 - Incorporation of wildlife overpasses and culverts that would allow wildlife passage across a proposed I-11 in Avra Valley;
 - Incorporation of additional wildlife bridges over the CAP canal and culverts along it to maintain connectivity for tortoises and other wildlife in the Hassayampa River Valley;
 - Evaluation of the tumamoc globeberry if the Tumamoca Preserves are impacted by the placement of the I-11 Corridor;
 - Impact of noise and lighting from I-11 on wildlife connectivity within the Tucson Mitigation Corridor, Avra Valley, and the Hassayampa River Valley; and
 - The impact of prospective community growth and development associated with I-11 on wildlife and wildlife connectivity in Avra Valley, the Hassayampa River Valley, and the Tucson Mitigation Corridor.

US Customs and Border Protection

- There is a permanent checkpoint on I-19, which would be impacted should the corridor be widened. If additional traffic is anticipated there may be environmental concerns with idling trucks and traffic back-ups at the checkpoint. If a parallel route were constructed, another checkpoint would be needed.

US Department of Agriculture

- Since this is a corridor project, a Farmland Conservation Impact Rating for Corridor Type Projects Form (NRCS-CPA-106) will be needed by the National Resources Conservation Service (NRCS) to complete the determination on potential presence and conversion of Prime and Unique Farmlands for the alternatives.

US Environmental Protection Agency

- Purpose and need statement should concisely identify why the project is being proposed and focus on the desired outcomes of the project rather than prescribing a predetermined solution; the need for the proposed improvements must be articulated and justified with consideration of the existing and planned facilities in the area.



- Recommends studying the use of existing corridors wherever possible in order to reduce the many environmental impacts that occur through the construction of new linear transportation facilities.
- Explore and objectively evaluate a full range of alternatives, including, but not limited to, the No Build Alternative, improvements to existing facilities, and alternatives that incorporate rail, transit, and/or other multimodal options.
- A multimodal corridor provides the opportunity to co-locate vehicular transportation facilities with rail, utility, bicycle, and green energy facilities, thus consolidating the right-of-way needed for each. Strongly supports combining projects into a single corridor wherever possible.
- Recommends building a state-of-the-art interstate corridor that incorporates the highest levels of environmental design and energy efficiency available into construction and maintenance. FHWA should provide a clear vision for how the new interstate would be built and maintained in a manner that reduces energy use, avoids impacts to environmental resources, and provides for restoration and/or enhancement of previously impacted drainages and wildlife corridors on any existing facilities incorporated into the corridor.
- Identify measures to conserve water and manage stormwater runoff.
- Project may involve the discharge of dredged or fill material into jurisdictional wetlands and waterways; discharges of dredged or fill material into waters of the US require authorization by the USACE under the Clean Water Act (CWA) Section 404. Encourages FHWA to meet and discuss project alternatives with the USACE and USEPA early in the planning process.
- Explore on-site alternatives to avoid or minimize impacts to specific waters. Identify potential sites for wildlife crossings and types of crossings that will result in the least damage to aquatic resources.
- Several special-status wildlife species have the potential to occur within the project area; describe efforts to avoid and/or minimize impacts to threatened and endangered species and associated habitats, as well as preserves, parks, and restoration and habitat management areas. Recommends early coordination with the AGFD and USFWS.
- Provide a detailed discussion of ambient air conditions, National Ambient Air Quality Standards (NAAQS), criteria pollutant nonattainment areas, and potential air quality impacts, including cumulative and indirect impacts. The study area passes through areas that are designated as non-attainment for 8-hour Ozone, particulate matter less than 10 microns in diameter (PM10), and particulate matter less than 2.5 microns in diameter (PM2.5).
- Analyze potential greenhouse gas (GHG) emissions and impacts on climate change from construction and operation of project, and what impacts climate change might have on the project. Does not recommend comparing GHG emissions from a proposed action to global emissions.
- Cumulative impact analysis should analyze the impacts of other past, present, and reasonably foreseeable projects or actions and then consider those cumulative impacts in their entirety.
- Concerned about the potential indirect impacts related to growth-inducement.
- Identify whether the proposed alternatives may disproportionately and adversely affect low income or minority populations in the area and discuss mitigation measures for any adverse impacts.

US Fish and Wildlife Service

- USFWS will offer expertise related to Federal trust species (i.e., federally-listed threatened and endangered species, candidate species, bald and golden eagles, and migratory birds) and coordination with the ESA of 1973.

US Forest Service, Coronado National Forest

- Coronado National Forest (CNF) does not wish to see any portion of I-11 cross National Forest System lands.
- Much of the proposed corridor study area west of I-19 contains three different Inventoried Roadless Areas; development of a road in an inventoried roadless area is prohibited by law under the “2001 Roadless Rule”.
- Two existing Wildernesses (i.e., Pajarita and Mount Wrightson) exist within proposed corridor study area (east and west of I-19 near Tubac, Arizona); development of a road within Wilderness is prohibited under the Wilderness Act.
- Proposed action will be subject to consultation under Section 7 of the ESA. The CNF supports the largest number of endangered and threatened species in the region and designated or proposed critical habitat for several of them. The proposed corridor study area supports designated critical habitat for Mexican spotted owl, Chiricahua leopard frog, southwestern willow flycatcher, and jaguar and proposed critical habitat for western yellow-billed cuckoo. The area also supports known populations of western yellow billed- cuckoo, Mexican spotted owl, jaguar, Sonoran chub, Pima pineapple cactus, lesser long-nosed bat, Chiricahua leopard frog, and northern Mexican gartersnake, all of which are listed as threatened or endangered. A number of species that are being considered for listing under the ESA as threatened or endangered, as well as 75 Regional Forester's Sensitive Species and the Santa Rita-Tumacácori wildlife corridor occur in the proposed corridor. Experience with high profile large scale projects has shown that ESA issues, in particular, are highly controversial and become the central focus of the project increasing cost and delays and adversely affecting the species themselves.
- Compliance with the ESA requires federal actions to be conducted such that they are not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitat. If a project reaches the level of "jeopardy" or "adverse modification" then the USFWS has the authority to mandate alternatives to the proposed action.
- Forest Service Manual 2670 regulation directs the USFS to develop and implement management practices to ensure that species do not become threatened or endangered and maintain viable populations of all native and desired nonnative wildlife, fish, and plant species in habitats distributed throughout their geographic range on National Forest System lands.

Yavapai County Public Works Department

- Since the study ends near the intersection of US 93 and SR 89 near Wickenburg Ranch, Yavapai County's input on this study will be limited to that specific area of the County; concern would be how local residents access the ultimate system improvements and any adverse impacts to local businesses.
- Concerned about resources going to I-11 that might take away from improving I-17; since there are no good alternative routes to I-17 during the frequent traffic backups and shutdowns that occur, this region is concerned that I-17 receive adequate resources with regard to mobility issues.

4 PUBLIC SCOPING

Members of the public were notified of and invited to participate in the scoping process for the I-11 Corridor. Public scoping meetings were held throughout the Corridor Study Area to provide accessible options for all willing participants. The meetings were intended to inform the public of the environmental review process, as well as provide an opportunity to comment. Other methods were also available for the public to engage in the scoping process, as described below.

4.1 Public Scoping Outreach

4.1.1 Notification

ADOT issued press releases and advertised the scoping process and public scoping meetings in study area newspapers, as presented in **Table 4-1** (Scoping Meeting Notice Publications). ADOT also posted an announcement of the meetings on the study’s website, sent e-mail blasts to stakeholders listed in the study database, and ran radio advertisements on one tribal community radio station, KPVT – 100.3 FM. In addition, the newspaper, Nogales International, ran an article about the scoping meeting on June 3, 2016, and the City of Nogales posted a scoping meeting announcement on their website. The ADOT Public Information Office conducted and coordinated several media interviews about public scoping meetings before, during, and after the process. The public scoping outreach print items can be found in **Appendix A** (Scoping Notifications).

Table 4-1 Scoping Meeting Notice Publications

Newspaper Publications	Publication Print Date
North Section	
Arizona Republic – Community Zones 1, 5, and 20	Zone 5 – Wednesday, June 1, 2016 Zone 1 and 20 – Wednesday, June 15, 2016
Prensa Hispana	Thursday, June 2, 2016
West Valley View	Wednesday, June 8, 2016
Buckeye Star	Friday, June 10, 2016
Wickenburg Sun	Wednesday, June 15, 2016
Central Section	
TriValley News – Casa Grande Edition	Wednesday, May 25, 2016 Thursday, May 26, 2016
AZ Republic – Community Zone 6	Friday, May 27, 2016
Prensa Hispana	Thursday, June 2, 2016
Gila River Indian News; Ak-Chin Runner	Friday, June 3, 2016
South Section	
Desert Times; The Explorer	Wednesday, June 1, 2016
Tohono O’odham Runner; Arizona Bilingual; La Estrella	Friday, June 3, 2016
Green Valley News	Sunday, June 5, 2016
Arizona Daily Star	Monday, June 6, 2016
Marana News	Wednesday, June 15, 2016

4.1.2 Title VI, Environmental Justice, and Limited English Proficiency

Various federal laws and executive orders were enacted to protect low-income and minority populations. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin, including individuals with limited English proficiency (LEP). The ruling in *Lau v. Nichols*, 414 U.S. 563, 568 (1974) determined that a failure to address LEP among beneficiary classes in the context of any federally assisted program or activity that provides services to the public could constitute discrimination.

The USEPA and FHWA define environmental justice as “fair treatment for people of all races, cultures, and incomes, regarding the development of environmental laws, regulations, and policies.” Environmental justice principles and procedures are followed to improve all levels of transportation decision making.

Executive Order 12898 (1994) on environmental justice addresses minority and low-income populations. The rights of women, the elderly, and the disabled are protected under related statutes. This Presidential Executive Order and other related statutes fall under the umbrella of Title VI. The USDOT Order 5610.2(a) requires that environmental justice principles be considered in all USDOT programs, policies, and activities.

In the context of transportation, effective and equitable decision-making depends on understanding and properly addressing the unique needs of different socioeconomic groups. The USDOT Environmental Justice Strategy identifies three fundamental principles of environmental justice that guide USDOT actions:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

To meet the intent, guidelines, and requirements of Title VI, environmental justice, and LEP, the following standards were in place for each public scoping meeting:

- An ADOT Civil Rights Office representative attended the public scoping meetings, provided Title VI brochures (in both English and Spanish) to hearing attendees, and displayed the Title VI informational poster board;
- The opportunity was provided for attendees to complete the voluntary Title VI Self Identification Survey card;
- Americans with Disability Act (ADA) accommodations were provided in all public scoping meeting advertising; and
- Spanish translation was available at each meeting, with other translation services available upon request.

Following an evaluation of the Corridor Study Area’s demographic data related to Title VI, LEP, and environmental justice, ADOT and FHWA identified techniques to address and reduce linguistic, cultural, institutional, geographic, and other barriers to meaningful participation.

Exhibits of bilingual meeting notifications and materials are included in **Appendix A** (Scoping Notifications) and **Appendix E** (Public Scoping Meeting Materials), respectively. Many of these overlap with tools that also reach the public at large, with a goal of providing access so everyone can participate:

- Translating all public involvement materials (included newspaper advertisements) into Spanish and other languages such as Chinese upon request;
- Providing Spanish interpretation at all public meetings and hearings, as well as other languages upon request;
- Adding “Google Translate” to the study website, allowing translation of website text into approximately 100 languages, including Chinese and Vietnamese populations found within the Corridor Study Area;
- Including Spanish language graphics for download on the study website, as well as other languages upon request;
- Establishing a bilingual study hotline both in English and Spanish (1-844-544-8049);
- Integrating elected officials, intergovernmental liaisons, and special interest groups into the process;
- Coordinating, implementing, and documenting communications protocols with the 4 adjacent and 22 statewide tribal governments;
- Using advertising and graphics to reach illiterate or environmental justice populations;
- Holding public meetings in locations that are easily accessible and ADA compliant;
- Holding public hearings along transit lines for those who are transit dependent; and
- Providing reasonable accommodations such as for sign-language interpreters upon request.

4.2 Public Scoping Meetings

A summary of the public scoping meetings is presented in **Table 4-2** (Public Scoping Meetings). As shown, six public scoping meetings were held throughout the Corridor Study Area from June 8, 2016 to June 29, 2016. Public scoping meetings were held in Casa Grande, Buckeye, Nogales, Tucson, Marana, and Wickenburg. In total, 540 people attended the public scoping meetings.

During these public scoping meetings, ADOT described the study objectives, as well as sought input on the purpose and need; potential alternatives to be studied; impacts to be evaluated; and evaluation methods to be used. **Figure 4-1** (Public Scoping Meeting in Tucson) shows the scoping presentation being given by ADOT staff at the public scoping meeting in Tucson. A copy of the meeting presentation and materials is provided in **Appendix E** (Public Scoping Meeting Materials).

Following the presentation, the public scoping meetings convened to an open house format, allowing meeting participants to walk around the room and learn more about the study as displayed on poster boards. Staff from the study team was available to provide clarification on the study process and answer any questions. In addition, participants were able to provide verbal comments directly to a court reporter that was present on site at each public scoping meeting. They could also complete a comment form at the meeting or take it with them to submit after the meeting, if necessary.

Table 4-2 Public Scoping Meetings

Meeting Date and Time	Location	Attendees
Casa Grande June 8, 2016; 4:00 PM to 6:30 PM	Dorothy Powell Senior Adult Center, Dining Room 405 East 6th Street, Casa Grande, AZ	51
Buckeye June 15, 2016; 4:00 PM to 6:30 PM	City of Buckeye Community Center, Multipurpose Room 201 East Centre Avenue, Buckeye, AZ	53
Nogales June 21, 2016; 4:00 PM to 6:30 PM	Nogales High School Cafeteria 1905 North Apache Boulevard, Nogales, AZ	41
Tucson June 22, 2016; 4:00 PM to 6:30 PM	Arizona Riverpark Inn 777 West Cushing Street, Tucson, AZ	150
Marana June 23, 2016; 4:00 PM to 6:30 PM	Marana Middle School Gymnasium 11285 West Grier Road, Marana, AZ	150
Wickenburg June 29, 2016; 4:00 PM to 6:30 PM	Wickenburg Community Center 160 North Valentine Street, Wickenburg, AZ	95
TOTAL		540



Figure 4-1 Public Scoping Meeting in Tucson

Roll plot maps of the Corridor Study Area split into three sections -- South, Central, and North -- were also available for more detailed viewing at each public scoping meeting, as shown on **Figure 4-2** (Public Scoping Meeting in Casa Grande). Participants could provide comments on the maps via comment cards or draw directly on the maps, as found in **Appendix F** (Public Scoping Comments). These maps allowed meeting participants to identify potential opportunities, constraints, corridor alternatives, and other issues within the Corridor Study Area, which will be considered in the overall environmental review process.



Figure 4-2 Public Scoping Meeting in Casa Grande

All of the public scoping meetings were held at ADA accessible locations. Informational materials were developed in an easy-to-read format and included visuals as appropriate. Meeting materials were provided in English and Spanish, and individuals could also request them in Chinese. All meeting notifications and outreach advertised that attendees with special needs should contact ADOT in advance of the meetings to request assistance. No special assistance requests were received during the scoping process.

4.3 Public Scoping Comments

The FHWA and ADOT provided the public with multiple opportunities to submit both written and verbal comments over the course of the scoping period. The public could submit comments through the following options:

- **Comment form** provided at scoping meetings (or mailed after meeting)
- **Transcribed verbally** at scoping meetings via a court reporter
- **Map comments** at scoping meetings
- **Online survey** on study website at i11study.com/Arizona
- **E-mail** at I-11ADOTStudy@hdrinc.com
- **Mail** to Interstate 11 Tier 1 EIS Study Team c/o ADOT Communications, 1655 W. Jackson St., MD 26F, Phoenix, AZ 85007
- **Voicemail** on toll free hotline at 1-844-544-8049 (bilingual).

In total, 834 types of public comments were received through these outreach methods, as shown in **Table 4-3** (Summary of Public Comments Received).

Table 4-3 Summary of Public Comments Received

Comment Type	Corridor Study Area Section ⁽¹⁾			Total Number
	North	Central	South	
Comments Submitted at Meetings ⁽²⁾				
Comment Form	23	12	82	117
Transcribed Verbally	8	10	23	41
Sub-Total	31	22	105	158
Other Comments Submitted				
Online Survey	522			522
E-mail	110			110
Mail	20			20
Comment Forms Mailed	18			18
Voicemail	6			6
TOTAL				834

NOTES: (1) Comments submitted by people who attended meetings within North, Central, or South sections of Corridor Study Area; (2) Comments written on maps at meetings not included in total, but are transcribed and summarized in **Section 4.3.2** (Map Comments).

4.3.1 Summary of Public Comments

A summary of the main substantive comments received from the public is provided in this section, with a complete compilation of the public scoping comments found in **Appendix F** (Public Scoping Comments). A majority of the comments were received through the online survey and comment form, with a total of 657 total responses. The online survey and comment form mirrored each other in terms of content and format, asking the same six questions. The questions included a series of potential issues or impact areas in which to provide a priority ranking (1 to 5), with 1 being the most important and 5 being the least important. The consolidated responses from Questions 1 to 4 of the online survey and comment form are displayed on:

- **Figure 4-3** (Problems Experienced Today)
- **Figure 4-4** (Importance of What I-11 Should Be or Accommodate)
- **Figure 4-5** (Importance of Human Environmental Factors)
- **Figure 4-6** (Importance of Natural Environmental Factors).

Following is a summary of the respondents' ranking results for the potential issues and impacts asked in Questions 1 to 4:

- **Question 1 (Problems Experienced Today):** Most important occurring or anticipated problems voiced by participants are to relieve regional congestion; improve travel time and reliability, followed closely by improving freight travel and reliability; reducing bottlenecks on existing freeways.
- **Question 2 (Importance of What I-11 Should Be or Accommodate):** I-11 Corridor should be or accommodate enhancing or expanding an existing highway/freeway.
- **Question 3 (Importance of Human Environmental Factors):** Most important human environmental factor to consider is land use, followed by neighborhoods, diverse communities, and residences.
- **Question 4 (Importance of Natural Environmental Factors):** Most important consideration related to the natural environment is water resources, followed closely by biological resources (plants, wildlife, habitat).

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. (1= highest ranking [most important], 5=lowest ranking [least important])

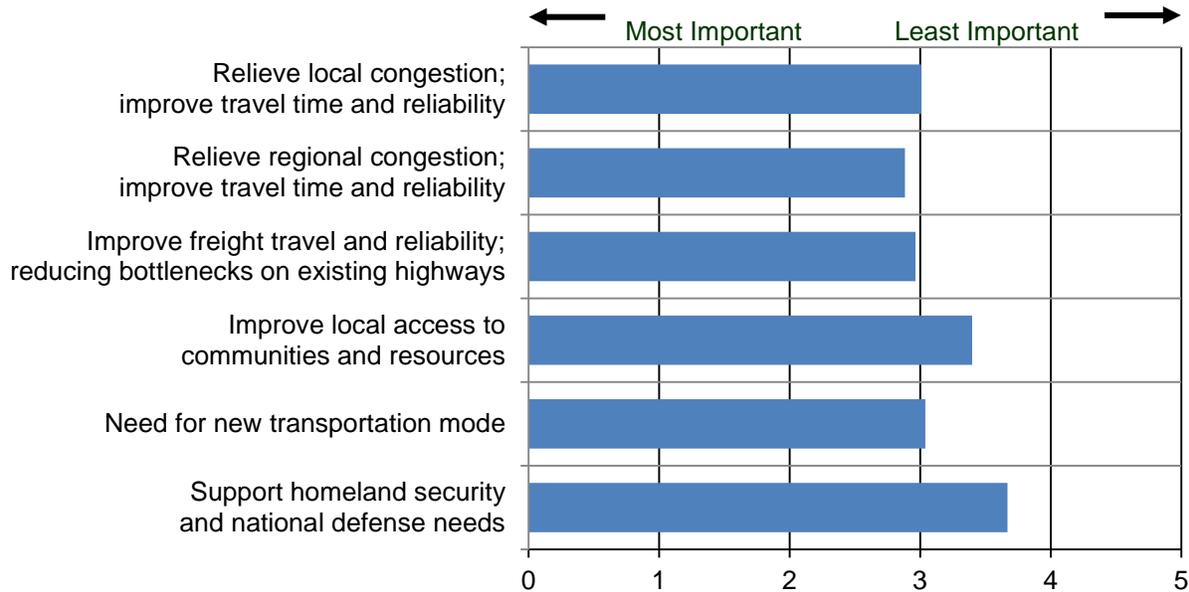


Figure 4-3 Problems Experienced Today

Question #2: What should I-11 be or accommodate within the Corridor. Please rank the following in order of importance to you. Please rank the following. (1= highest ranking [most important], 5=lowest ranking [least important])

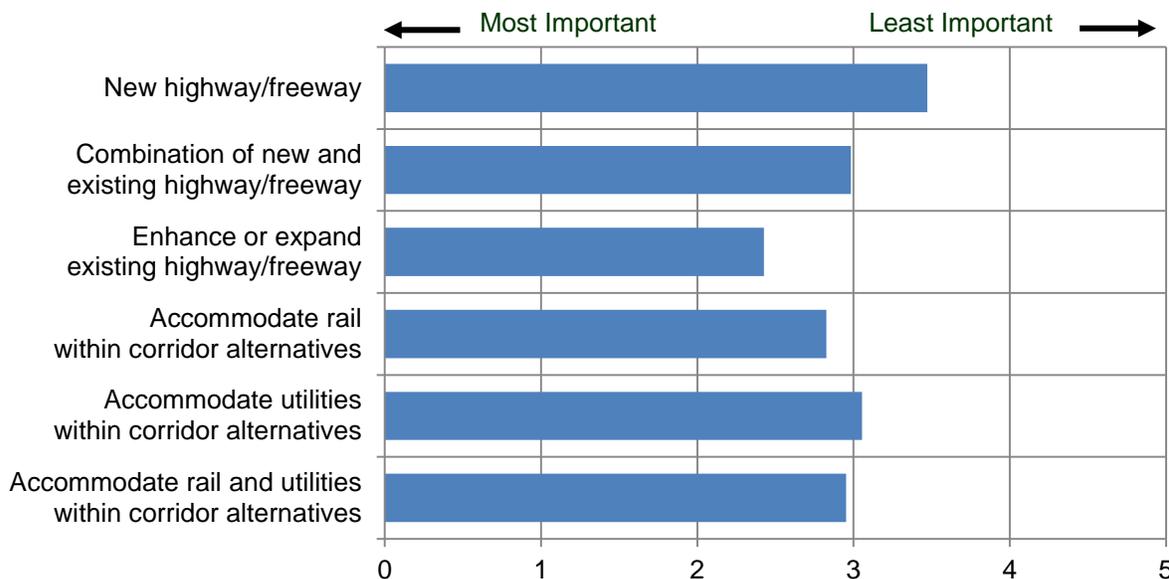


Figure 4-4 Importance of What I-11 Should Be or Accommodate

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])

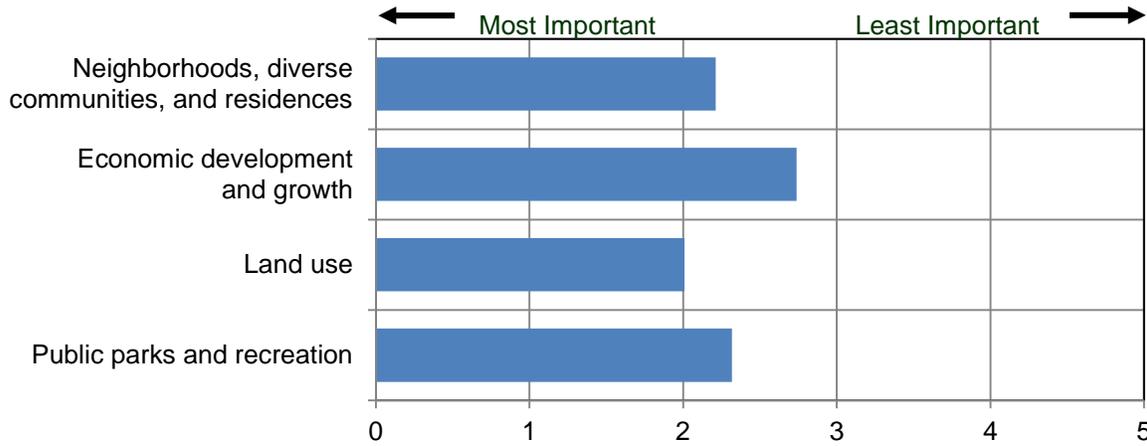


Figure 4-5 Importance of Human Environmental Factors

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])

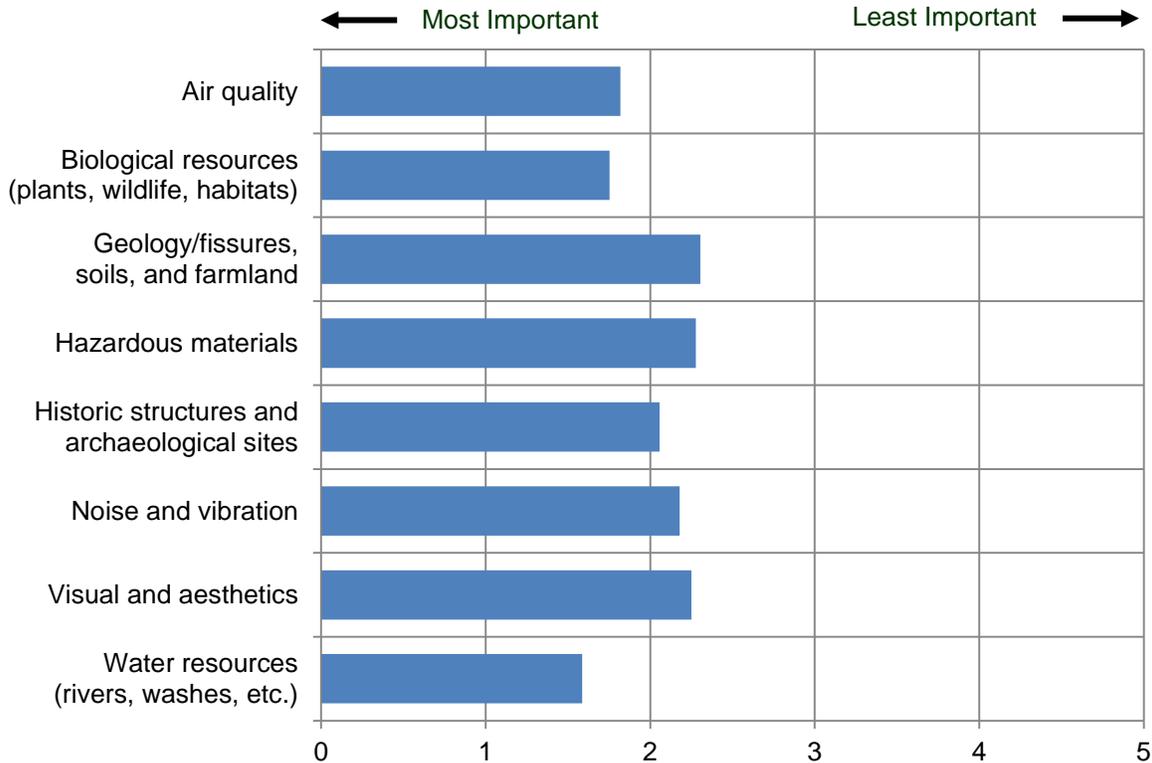


Figure 4-6 Importance of Natural Environmental Factors

Question 5 of the online survey and comment form asked people to identify the areas or resources within the Corridor Study Area that they feel must be avoided or are important to consider. A summary of these write-in comments are listed below, organized into the following major categories: Environmental Considerations, Corridor Alternative Planning, Multimodal Considerations, Economic Considerations, and Other General Comments. These comments also include other verbal and written comments received via the court reporter, voicemail, e-mail, or mail. A compilation of all comments received is located in **Appendix F** (Public Scoping Comments). The media coverage received during the scoping period is found in **Appendix G** (Media Coverage).

Environmental Considerations

- Concern regarding impacts to environment, specifically potential irreparable damage to Sonoran Desert
 - Concern that environmental, historic, and archeological impacts of I-11 Corridor could not be mitigated
 - Concern for habitats, habitat linkages, and occurrences of Sonoran Desert Tortoise
 - Concern regarding potential impacts to wildlife migration corridors
 - Concern for impacts to environmental sustainability, wilderness, air quality, riparian habitat along the Santa Cruz river, viewsheds, dark skies, noise, vegetation management, and recreational visitor use
 - Minimize impacts on environment and night skies
 - Do not disturb farmland or fauna
- Minimize disturbances to undeveloped lands
 - Do not surround or disturb natural resource areas
 - Develop valley rather than environmentally sensitive foothills
 - I-11 should remain as close as possible to I-19 to spread environmental degradation
- Avoid parks and conservation management areas
 - Avoid Coronado National Forest
 - Protect Saguaro National Park West
 - I-11 should not be built if it will go through a national park and reservation
 - Avoid National Monuments, rivers and washes, cultural resources; specific mention of Belmont Mountain, Vulture Mountain Park, Hassayampa and Gila Rivers, Mormon and Butterfield Stage Trails
 - Concern that corridor may impact a number of lands that have special significance to public (i.e., Ironwood Forest National Monument, Tohono O’odham Nation, Tucson Mountain District of Saguaro National Park, Tucson Mountain County Park, and Arizona Sonora Desert Museum)
 - I-11 will ruin natural desert and national parks
- Specific concerns to Avra Valley
 - Avra Valley is covered by a habitat conservation plan
 - Avra Valley cannot accommodate an interstate and retain all currently designated set-asides in the environment
 - Avra Valley would be degraded by I-11’s construction
- General considerations
 - I-11 should consider fauna, cattle operations, Kitt Peak, and hunting area 36A
 - Concern about impacts to neighborhoods and eminent domain
 - New alignment considerations must include dust storms and wildlife crossings

Corridor Alternative Planning

- Support for I-11 as a separate facility
 - Use a route running straight south from I-10 at the Pima-Pinal County Line to the southwest corner of the San Xavier Reservation, then straight east to I-19
 - Sandario and San Joaquin roads could connect to Old Vail Road with an extension as a good bypass
 - Consider I-11 next to the already-cut CAP
 - Multiple comments favor new alignments further to the west in the north section, especially west of Wickenburg
 - Build new interstate west of Loop 303 and Sun Valley Parkway
 - Locate I-11 near Tonopah
- Improve existing freeways and interstates (e.g., I-10, I-8, I-19)
 - Existing freeways should be widened and have dedicated truck lanes
 - Do not build - use existing roads
 - Multiple comments favor use of existing routes south of I-10
 - I-19 has enough capacity south of Green Valley so an additional corridor is not needed there
 - I-19 should be expanded by two lanes and double deck I-10 through Tucson
 - Widen and improve existing I-19
 - General opposition to a new interstate corridor through Avra Valley
 - Stacking I-11 over I-10 is common theme to limit increased noise, pollution, and unsightly building
 - Widen I-10
 - Improve SR 85 instead as a more direct route
 - Consider using Loop 303 on the Valley's west side
- Spot improvement suggestions and considerations
 - Proposed flyover freeway from the Mariposa port of entry on SR 189 as direct access on I-19 is where congestion occurs
 - Interchanges are key considerations for Avra Valley
 - Logical future intersection with US 93 would be near existing US 93/SR 71 junction
- Future connectivity considerations
 - Continue south of Nogales
 - Route needs to extend to Guaymas, Mexico
- General comments
 - Questions regarding future alignments and potential property impacts
 - Comments regarding any necessary improvements to other transportation facilities to connect to I-11, including traffic projections and impacts
 - Opposition to CANAMEX
 - I-11 should be accessible from Nogales
 - Improved movement of freight is needed

Multimodal Considerations

- Freeways are an outdated model to transportation congestion
- Accommodate rail and utilities within corridor alternatives
- Support for light rail and passenger rail as an alternative to an interstate
- Freight considerations

- Improve freight travel and reliability
- Utilize dedicated truck lanes
- Rail is faster and less congestive

Economic Considerations

- Concern regarding property values and increased heavy truck traffic
- Concern that I-11 will hurt tourism and decrease the number of existing jobs
- Concern that I-11 is an example of “crony capitalism”
- Use I-11 to grow business development in the area just south of Casa Grande and I-10
- I-11 will bring economic benefit to state and surrounding communities

Other General Comments

- Requests for presentation materials
- Request for information/added to mailing list
- Concern I-11 corridor will be used for sex-trafficking crimes
- I-11 is not needed; project wastes money
- Scope will bloom out of control because of influential parties whose money and voices are louder
- Address external factors that impact the existing infrastructure specifically increase of shipping containers from Mexico into Arizona
- I-11 should not be built if it uproots people from their homes and jobs
- I-11 Corridor would primarily benefit corporate and business interests and politicians

Question 6 of the online survey and comment form asked about preferences for receiving information about the study. Accordingly, a significant majority of respondents prefer to receive study information via **e-mail**.

4.3.2 Map Comments

Figures 4-7 (Public Scoping Feedback in South Section), **Figure 4-8** (Public Scoping Feedback in Central Section), and **Figure 4-9** (Public Scoping Feedback in North Section) illustrate major potential constraints, opportunities, and/or resource areas noted by the public. This includes notes from the comment forms, along with the 30 roll plot maps that were marked up during the public scoping meetings. The full set of map mark-ups is located in **Appendix F** (Public Scoping Comments).

Figure 4-10 (Public Scoping Feedback on Corridor Alternative Preferences) delineate the input received on potential corridor alternatives. These figures include corridor alternative suggestions received through the comment forms, as well as the mark-ups of the large roll plot maps that were available at the public scoping meetings.

Data or comments received post-scoping is not reflected on the summary maps, but will be taken into consideration for subsequent study phases (e.g., developing and screening corridor alternatives).

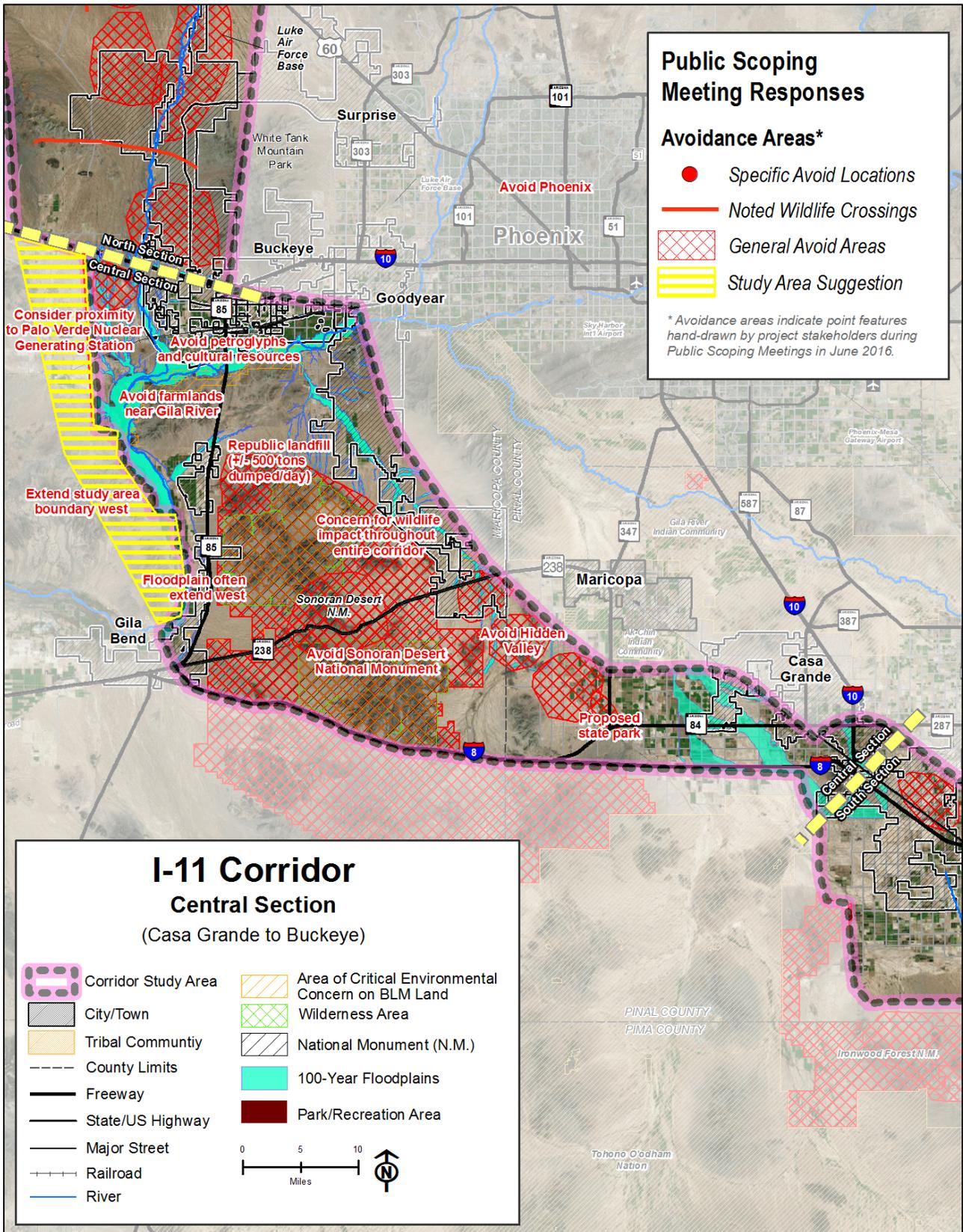


Figure 4-8 Public Scoping Feedback in Central Section

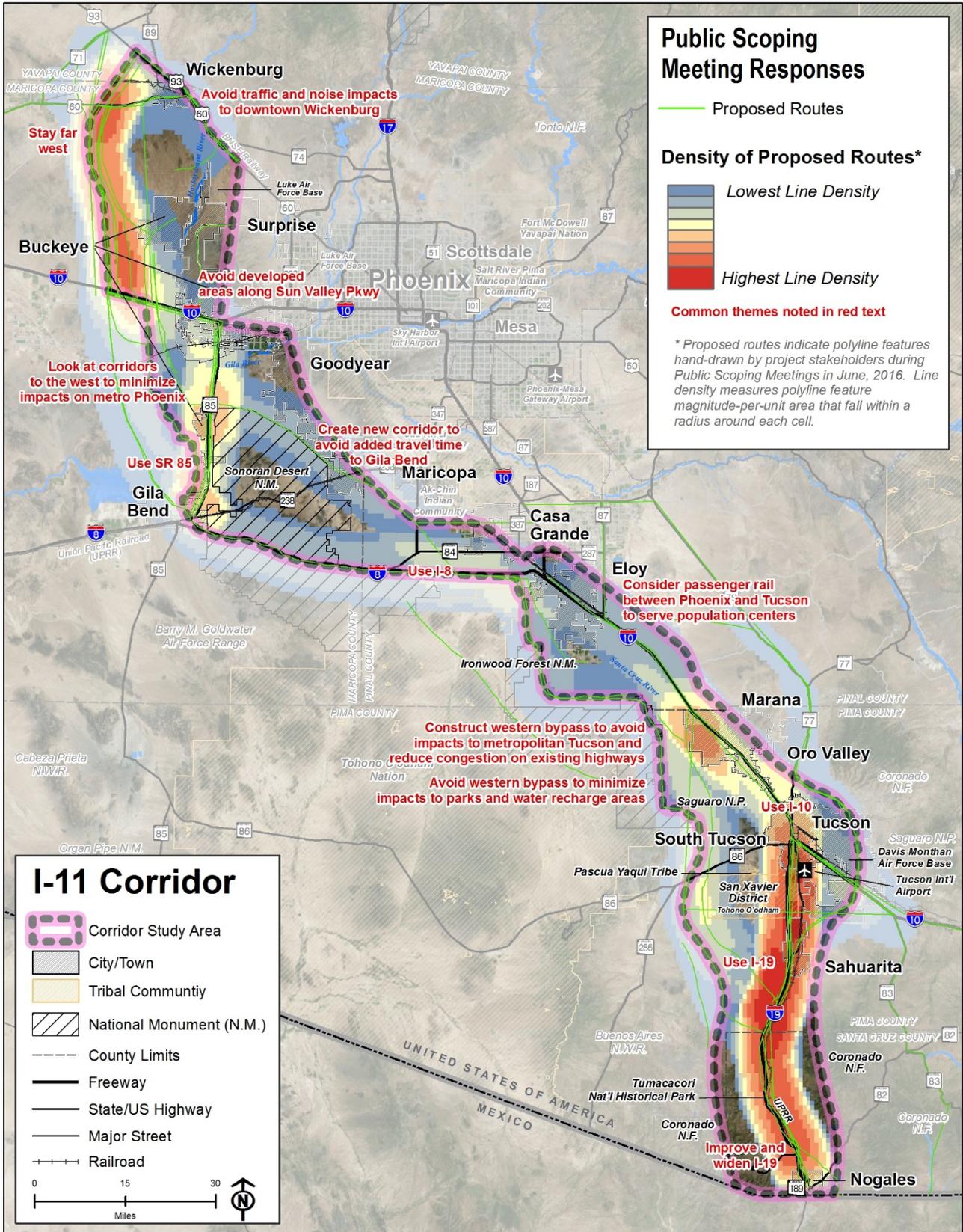


Figure 4-10 Public Scoping Feedback on Corridor Alternative Preferences

5 SUMMARY AND NEXT STEPS

The scoping process documented in this *Scoping Summary Report* complies with NEPA requirements, providing both the agencies and public an opportunity for early input into the environmental review process for the I-11 Corridor. During the scoping period, the FHWA and ADOT conducted three agency and six public scoping meetings between June 7, 2016 and June 29, 2016. These scoping meetings were held throughout the Corridor Study Area, including Buckeye, Casa Grande, Marana, Nogales, Phoenix, Tucson, and Wickenburg. The meetings attracted over 600 agency representatives and community members. Meeting attendees were encouraged to share verbal and written comments, as well as mark suggestions and concerns on maps of the Corridor Study Area. This report documents the process followed and summarizes major themes of comments received. The FHWA and ADOT will consider these comments as the I-11 Corridor advances into the next phase of the environmental review process.

5.1 Alternatives Selection Report

Following scoping, a comprehensive range of corridor alternatives will be considered during the preparation of the ASR. The corridor alternatives will be developed, evaluated, and screened based on an ASR methodology and criteria that will be reviewed by the Cooperating and Participating Agencies, including consistency with Purpose and Need. Potential criteria may include measures related to population and employment, congestion and travel times, system linkages and interstate mobility, economic activity centers, homeland security and national defense, engineering constraints, environmental, and community acceptance, among others. The screening will enable the FHWA and ADOT to eliminate corridor alternatives that are not feasible or prudent, as well as to refine and further consider corridor alternatives that are most likely to best meet the overall Purpose and Need of the I-11 Corridor. Ultimately, the screening process will yield a reasonable range of Build Corridor Alternatives and a No Build Alternative (i.e., do-nothing option) that will advance into the Draft Tier 1 EIS document for more detailed study.

5.2 Draft Tier 1 EIS

The FHWA and ADOT will prepare a Draft Tier 1 EIS to more fully assess the reasonable range of build corridor alternatives and No Build Alternative that emerge from the ASR. The Draft Tier 1 EIS will:

- Identify the Purpose and Need for the I-11 Corridor;
- Describe the screening process and each of the build corridor alternatives for a proposed interstate freeway facility;
- Evaluate the affected environment and potential environmental impacts based on agreed upon assessment methodologies for the environmental resource areas;
- Identify the Preferred Corridor Alternative that best meets the Purpose and Need and minimizes potential environmental impacts; and
- Provide the public, agencies, and tribal governments opportunities to review and comment on the I-11 Corridor Tier 1 EIS.

The Draft Tier 1 EIS document will be circulated for public and agency comment over a 45-day review period. During this time, public hearings will be held to present the results of the Draft Tier 1 EIS and formally record all comments received.

5.3 Final Tier 1 EIS and Record of Decision

The FHWA and ADOT will complete the environmental review process with the preparation of a combined Final Tier 1 EIS and ROD. After consideration of comments received and if a Build Alternative is selected, the FHWA will issue the combined Final Tier 1 EIS and ROD document pursuant to Moving Ahead for Progress in the 21st Century Act (MAP-21) and the FAST Act, unless the FHWA determines that statutory criteria or practicability considerations preclude a combined document.

The combined Final Tier 1 EIS and ROD will document a Selected Corridor Alternative (Build or No Build); present the basis for the decision; describe the alternatives considered; and provide strategies to avoid, minimize, and compensate for environmental impacts. The FHWA will ultimately approve the Final Tier 1 EIS and ROD as the Federal Lead Agency under NEPA.

The primary goal of the ASR and Tier 1 EIS is to determine what the Selected Corridor Alternative will be, either a Build Corridor Alternative (2,000 feet in width) or the No Build Alternative. If a Build Corridor Alternative is selected, the Tier 1 EIS document would include information on:

- Potential social, economic, and natural environmental impacts;
- 2,000-foot-wide corridor for a proposed interstate freeway facility; and
- Proposed projects for a Phased Implementation Plan.

The Tier 1 EIS will provide a roadmap for advancing Phased Implementation Plan projects to the next phase – called Tier 2. In a tiered process, Tier 2 would be similar to a traditional project-level NEPA review. During the future Tier 2 environmental review process, ADOT and FHWA will conduct more detailed environmental and engineering studies for the proposed projects within the 2,000-foot-wide Selected Corridor Alternative, as illustrated on **Figure 5-1** (Corridor Alternatives Development and Environmental Review Process).

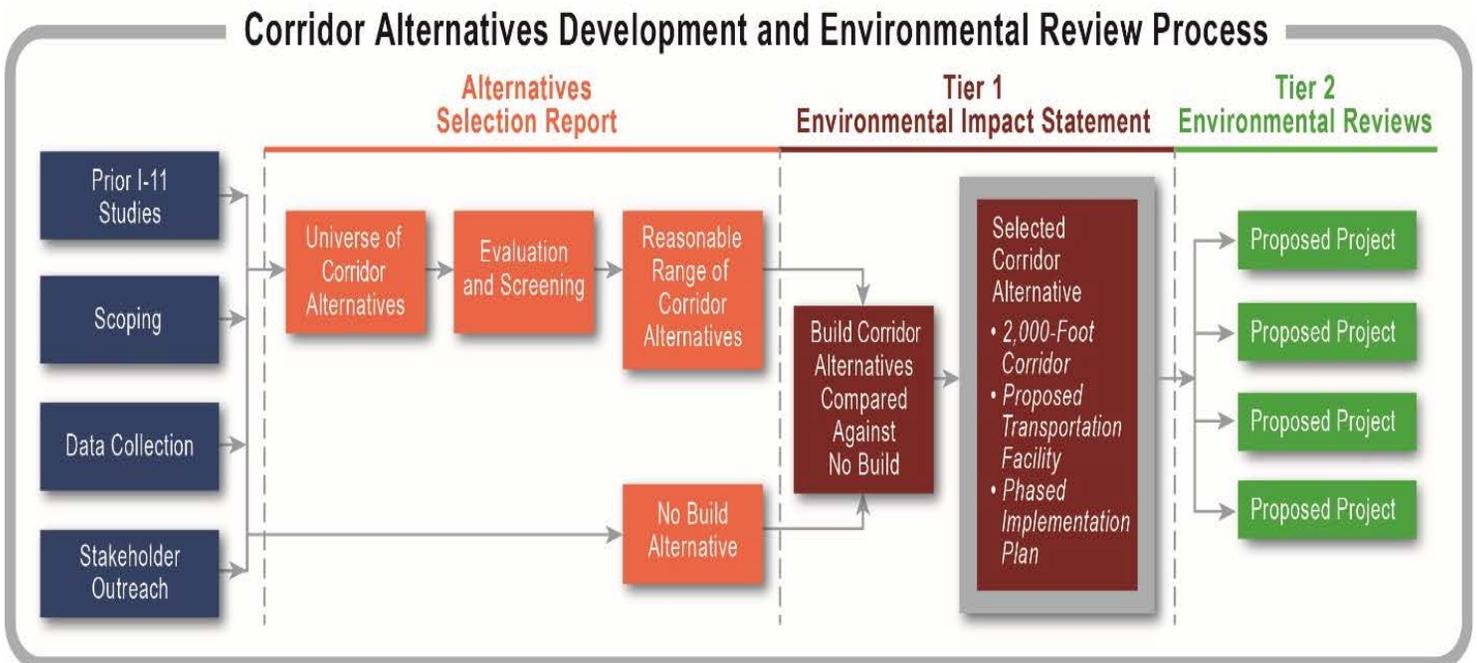


Figure 5-1 Corridor Alternatives Development and Environmental Review Process