SONORAN CORRIDOR
TIER I ENVIRONMENTAL IMPACT STATEMENT

Agency and Public Scoping Summary

From May 12 to July 15, 2017
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# Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADA</td>
<td>Americans with Disabilities Act</td>
</tr>
<tr>
<td>ADOT</td>
<td>Arizona Department of Transportation</td>
</tr>
<tr>
<td>CSR</td>
<td>Corridor Selection Report</td>
</tr>
<tr>
<td>DEIS</td>
<td>Draft Environmental Impact Statement</td>
</tr>
<tr>
<td>EJ</td>
<td>Environmental Justice</td>
</tr>
<tr>
<td>EIS</td>
<td>Environmental Impact Statement</td>
</tr>
<tr>
<td>EPA</td>
<td>Environmental Protection Agency</td>
</tr>
<tr>
<td>FAST</td>
<td>Fixing America’s Surface Transportation</td>
</tr>
<tr>
<td>FHWA</td>
<td>Federal Highway Administration</td>
</tr>
<tr>
<td>LEP</td>
<td>Limited English Proficiency</td>
</tr>
<tr>
<td>NEPA</td>
<td>National Environmental Policy Act</td>
</tr>
<tr>
<td>NOI</td>
<td>Notice of Intent</td>
</tr>
<tr>
<td>PAG</td>
<td>Pima Association of Governments</td>
</tr>
<tr>
<td>SR</td>
<td>State Route</td>
</tr>
<tr>
<td>TUS</td>
<td>Tucson International Airport</td>
</tr>
<tr>
<td>USDOT</td>
<td>United States Department of Transportation</td>
</tr>
</tbody>
</table>
Background

The Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) have initiated the environmental review process for the Sonoran Corridor. In April 2015, the Arizona State Transportation Board approved the designation of the Sonoran Corridor as State Route (SR) 410. Similarly, in December 2015, the funding and authorization bill Fixing America’s Surface Transportation Act or FAST Act was signed into law designating the Sonoran Corridor as a high capacity corridor along SR 410 connecting Interstate 19 and Interstate 10 south of the Tucson International Airport (TUS) as shown in Figure 1.

A Tier 1 Environmental Impact Statement (EIS) and a Corridor Selection Report (CSR) are being prepared as part of this process in accordance with the National Environmental Policy Act (NEPA) and other regulatory requirements. Conceptual engineering will be structured to select a Preferred Corridor location and preferred modal choice for accommodating future traffic needs in the Study Vicinity. The FHWA is the Federal Lead Agency and ADOT is the Local Project Sponsor under NEPA.

The EIS includes a Scoping process with development of a Need and Purpose and Range of Reasonable Alternatives, a CSR that follows a progressive reduction in the number of alternatives based on an agreed upon Evaluation Methodology, leading to the identification of a Preferred Corridor location and modal choice.

Scoping Overview

The study team held an agency scoping meeting and two public scoping meetings for the Sonoran Corridor Tier 1 EIS. The agency scoping meeting was held at the office of the Pima Association of Governments (PAG) on June 7th, 2017. The first public meeting was held on Wednesday, June 7, 2017, from 5:30 to 7 p.m. at Radisson Hotel Tucson Airport in Tucson, Ariz. The second public meeting was held on Thursday, June 8, 2017, from 5:30 p.m. to 7 p.m. at Santa Cruz Valley United Methodist Church in Sahuarita, Ariz. Scoping meetings were also held with the San Xavier District of the Tohono O’odham Nation on June 22 and 24, 2017 to discuss questions related to Tribal suggestions and concerns in the event any proposed alternatives were to cross tribal lands. The purpose of all scoping meetings was to share information about the study and gather input that will help inform the process to develop a “Need and Purpose Statement” and to identify the initial range of corridor alternatives. Representatives of all PAG member agencies, including members of the Tohono O’odham Nation and the Pascua Yaqui communities, attended the agency scoping meeting and approximately 45 members of the public attended each of the two agency scoping meetings.

The scoping process included a 60-day comment period which began May 12, 2017 and continued through July 15, 2017. This Scoping Summary Report describes the approach, the process and the findings of the agency and public scoping period.
Scoping Process

Scoping is an initial step in the environmental review process under NEPA. The Council on Environmental Quality’s 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
• Examines previous planning studies within current study development
• Seeks early feedback from the agencies, tribal governments, and public on:
  o Need and Purpose Statement
  o Alternatives to be studied
  o Impacts to be evaluated
  o Evaluation methods to be used
• Looks for opportunities to streamline the study process and collaborate with partners
• 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 alternatives to be studied, and the depth and breadth of environmental analysis to be completed.

**Pre-Scoping Activities**

The FHWA and ADOT held eight 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.

**Initiation of Scoping**

The FHWA issued a Notice of Intent (NOI) to prepare a Tier 1 EIS in the Federal Register on May 12, 2017. The NOI, under Volume 82, Number 91, notified interested parties regarding the intent to prepare a Tier 1 EIS for the Sonoran Corridor and solicited agency and public input on the scope of the Tier 1 EIS, including the Need and Purpose, potential corridor alternatives to be studied, impacts to be evaluated, and evaluation methods to be used.

**Scoping Period and Meetings**

The scoping process was conducted in accordance with NEPA requirements. The approximate 60-day scoping period began with the publication of the NOI and continued through July 15, 2017. The FHWA and ADOT invited agencies, tribal governments, and organizations by letter to participate in the scoping process and attend agency scoping meeting. Sample agency invitation letters are presented in Appendix A. The public was notified about the scoping process, public scoping meeting locations, and scheduled via newspaper advertisements, website, e-mail blasts, social media, news releases, media interviews, and blog posts. Two public scoping meetings were held in the Corridor Study Area: Tucson and Sahuarita.

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. A sample copy of the invitation letter is included in the project Coordination Plan. Each participation category is described in the following sections. A summary of the agency and public scoping process is provided in the following sections. Notification information is included in Appendix A. Agency and public meeting materials were the same and are included in Appendices B, C and D. Agency scoping comments are in Appendix E and public scoping comments are in Appendix E.

**Agency Scoping**

Cooperating and Participating agencies were identified based on their level of responsibility and engagement in the NEPA process related to the Sonoran Corridor. Invitations were sent to both categories of participants to verify the appropriate role of each in the Tier 1 EIS.

**Cooperating Agencies**

Cooperating Agencies are defined in Title 40 CFR 1508.5 and 23 CFR 771.111(d) as 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. The list below (Table 1) contains the 11 agencies invited to be a Cooperation Agency, along with a response to the invitation. Of those, four accepted the invitation and seven requested to change their status to Participating Agency, with FHWA’s concurrence. Arizona Game and Fish requested to change status from Participating to Cooperating, with FHWA’s concurrence.

**Table 1 - Cooperating Agencies**

<table>
<thead>
<tr>
<th>Agency</th>
<th>Response to Invitation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FEDERAL</strong></td>
<td></td>
</tr>
<tr>
<td>Bureau of Indian Affairs (BIA)</td>
<td>Accepted as Participating Agency</td>
</tr>
<tr>
<td>Bureau of Land Management (BLM)</td>
<td>Accepted as Participating Agency</td>
</tr>
<tr>
<td>Federal Aviation Administration (FAA)</td>
<td>Accepted</td>
</tr>
<tr>
<td>Federal Railroad Administration (FRA)</td>
<td>Accepted as Participating Agency</td>
</tr>
<tr>
<td>National Park Service (NPS)</td>
<td>Accepted as Participating Agency</td>
</tr>
<tr>
<td>U.S. Army Corps of Engineers</td>
<td>Accepted</td>
</tr>
<tr>
<td>U.S. Bureau of Reclamation (Reclamation)</td>
<td>Accepted</td>
</tr>
<tr>
<td>U.S. Environmental Protection Agency (EPA)</td>
<td>Accepted</td>
</tr>
<tr>
<td>U.S. Fish and Wildlife Service (USFWS)</td>
<td>Participating Agency (non response)</td>
</tr>
<tr>
<td>U.S. Forest Service (USFS), Coronado National Forest</td>
<td>Accepted as Participating Agency</td>
</tr>
<tr>
<td>Western Area Power Administration</td>
<td>Accepted as Participating Agency</td>
</tr>
<tr>
<td><strong>STATE</strong></td>
<td></td>
</tr>
<tr>
<td>Arizona Game and Fish Department (AGFD)</td>
<td>Accepted as Cooperating Agency</td>
</tr>
</tbody>
</table>

**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 Sonoran Corridor. The list below (Table 2) contains the 34 agencies invited to be a Participating Agency, along with their response to the invitation. Of those, 10 accepted the invitation and two, FTA and Davis-Monthan AFB, declined participation at this stage of the project. Agencies that did not respond are included as participating agencies unless they requested removal from the list.

**Table 2 - Participating Agencies**

<table>
<thead>
<tr>
<th>Agency</th>
<th>Response to Invitation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FEDERAL</strong></td>
<td></td>
</tr>
<tr>
<td>Federal Emergency Management Agency (FEMA)</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Federal Transit Administration (FTA)</td>
<td>Declined at this stage</td>
</tr>
<tr>
<td>U.S. Air Force (USAF), Davis-Monthan Air Force Base</td>
<td>Declined at this stage. Will review EIS</td>
</tr>
<tr>
<td>U.S. Customs and Border Protection (CBP)</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>U.S. Department of Agriculture (USDA)</td>
<td>Accepted (non-response)</td>
</tr>
</tbody>
</table>
**Table 2: Participating Agencies (continued)**

<table>
<thead>
<tr>
<th>Agency</th>
<th>Response to Invitation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STATE</strong></td>
<td></td>
</tr>
<tr>
<td>Arizona Air National Guard (AANG)</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Arizona Department of Corrections (ADOC)</td>
<td>Accepted</td>
</tr>
<tr>
<td>Arizona Department of Environmental Quality (ADEQ)</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Arizona Department of Public Safety (ADPS)</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Arizona Department of Water Resources</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Arizona State Land Department (ASLD)</td>
<td>Accepted</td>
</tr>
<tr>
<td>Arizona State Historic Preservation Office (SHPO)</td>
<td>Accepted</td>
</tr>
<tr>
<td>Arizona State Parks and Trails</td>
<td>Accepted</td>
</tr>
<tr>
<td><strong>REGIONAL</strong></td>
<td></td>
</tr>
<tr>
<td>Pima Association of Governments (PAG)</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Tucson Airport Authority (TAA)</td>
<td>Accepted</td>
</tr>
<tr>
<td><strong>COUNTY</strong></td>
<td></td>
</tr>
<tr>
<td>Pima County</td>
<td>Accepted</td>
</tr>
<tr>
<td>Pima County Flood Control District</td>
<td>Accepted</td>
</tr>
<tr>
<td><strong>LOCAL MUNICIPALITY</strong></td>
<td></td>
</tr>
<tr>
<td>City of South Tucson</td>
<td>Accepted</td>
</tr>
<tr>
<td>City of Tucson</td>
<td>Accepted</td>
</tr>
<tr>
<td>Green Valley Council</td>
<td>Accepted</td>
</tr>
<tr>
<td>Town of Sahuarita</td>
<td>Accepted</td>
</tr>
<tr>
<td><strong>UTILITY</strong></td>
<td></td>
</tr>
<tr>
<td>Central Arizona Irrigation and Drainage District</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Central Arizona Project (CAP)</td>
<td>Covered under Bureau of Reclamation.</td>
</tr>
<tr>
<td>Trico Electric Cooperative</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>UNS Energy Corporation/Tucson Electric Power (TEP)</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td><strong>TRIBAL</strong></td>
<td></td>
</tr>
<tr>
<td>Ak-Chin Indian Community</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Gila River Indian Community</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Pascua Yaqui Tribe</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Salt River Pima-Maricopa Indian Community</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>San Carlos Apache Tribe</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Tohono O’odham Nation</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Tonto Apache Tribe</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>White Mountain Apache Tribe</td>
<td>Accepted (non-response)</td>
</tr>
<tr>
<td>Yavapai-Apache Nation</td>
<td>Accepted (non-response)</td>
</tr>
</tbody>
</table>
Agency Scoping Comments

An agency scoping meeting was held in Tucson at the PAG offices at 9:00 AM on June 7, 2017. Forty representatives from 12 agencies attended the meeting in person or by telephone. Participants asked questions and provided insights about their concerns and the conduct of the study. Full letters and comments received from agencies during Scoping are included in Appendix E.

This section summarizes the agency scoping input received at the agency scoping meeting, as well as other written comments submitted by the agencies. The 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 in Table 3 - Agency Comments:

Overview of Agency Comments

- Make rail freight infrastructure part of the project
- Focus study on movement of commerce
- Consider a route that will provide access to Tucson International Airport from the south
- Reduce travel times by getting regional motorists to Interstate 19 faster
- Consider a route that connects Interstate 19 at El Toro Road
- Consider a route that connects I-19 near Pima Mine Road
- Area south of Interstate 10 is a major growth corridor. Consider commuter needs for workers in Vail and Tucson
- Be mindful of Tohono O'odham Nation processes and work with leadership and allottees as well as Bureau of Indian Affairs
- Consider effects of a new highway on air quality in the area
- Avoid impacts to existing electrical transmission lines
- Plan for how a new highway would interact with State Route 210 (Barraza-Aviation Parkway)
- Keep routes that would potentially accommodate trucks carrying hazardous materials away from existing schools and population centers
- Mitigate potential negative effects on habitat and wildlife corridors

Table 3 – Summarized Agency Comments

<table>
<thead>
<tr>
<th>Agency</th>
<th>Key Considerations in Study Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>FEDERAL</td>
<td></td>
</tr>
</tbody>
</table>
| Bureau of Indian Affairs                    | • Emphasize use of already disturbed areas  
  • Consider full range of multimodal alternatives  
  • Include multiple modes in corridor  
  • Consider state of the art environmental and sustainable design elements  
  • Maintain environmental integrity of water resources  
  • Identify and protect sensitive areas and aquatic systems  
  • Span water crossings to protect sediment transport, hydrologic processes and wildlife passage  
  • Protect sensitive wildlife and plant species  
  • Assess and make provisions to protect air quality  
  • Complete cumulative and indirect analysis of project impacts  
  • Consider impacts on environmental justice populations |
| US Environmental Protection Agency          | • ROW must get allottee and/or tribal approval  
  • Emphasize use of already disturbed areas  
  • Consider full range of multimodal alternatives  
  • Include multiple modes in corridor  
  • Consider state of the art environmental and sustainable design elements  
  • Maintain environmental integrity of water resources  
  • Identify and protect sensitive areas and aquatic systems  
  • Span water crossings to protect sediment transport, hydrologic processes and wildlife passage  
  • Protect sensitive wildlife and plant species  
  • Assess and make provisions to protect air quality  
  • Complete cumulative and indirect analysis of project impacts  
  • Consider impacts on environmental justice populations |
<table>
<thead>
<tr>
<th>Agency</th>
<th>Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td>US Army Corps of Engineers</td>
<td>Minimize impacts to aquatic resources</td>
</tr>
<tr>
<td>US Department of Agriculture</td>
<td>Support efforts to conduct environmental analysis</td>
</tr>
<tr>
<td>US Bureau of Reclamation</td>
<td>Ensure that the project does not impede the implementation of the Southern Arizona Water Rights Settlement Act and the Arizona Water Settlement Act</td>
</tr>
<tr>
<td></td>
<td>Protect existing and proposed facilities associated with the Tohono O'odham Nation's water rights settlement</td>
</tr>
<tr>
<td></td>
<td>Minimize impacts to the CAP Canal</td>
</tr>
<tr>
<td>US Bureau of Land Management</td>
<td>No known affected BLM lands</td>
</tr>
<tr>
<td>US Department of Agriculture</td>
<td>Support efforts to conduct environmental analysis</td>
</tr>
<tr>
<td>US Bureau of Reclamation</td>
<td>Ensure that the project does not impede the implementation of the Southern Arizona Water Rights Settlement Act and the Arizona Water Settlement Act</td>
</tr>
<tr>
<td></td>
<td>Protect existing and proposed facilities associated with the Tohono O'odham Nation's water rights settlement</td>
</tr>
<tr>
<td></td>
<td>Minimize impacts to the CAP Canal</td>
</tr>
<tr>
<td>US Forest Service, Coronado National Forest</td>
<td>Mitigate potential negative effects on habitat and wildlife corridors</td>
</tr>
<tr>
<td>Western Area Power Administration</td>
<td>Minimize impact to major transmission corridor</td>
</tr>
<tr>
<td></td>
<td>Transmission upgrade coming</td>
</tr>
<tr>
<td>Federal Railroad Administration</td>
<td>No comment at this time; apprise if project involves right-of-way preservation.</td>
</tr>
<tr>
<td>STATE</td>
<td></td>
</tr>
<tr>
<td>Arizona State Land Department</td>
<td>Optimize value of State Lands</td>
</tr>
<tr>
<td>Arizona Department of Environmental Quality</td>
<td>Ensure air quality is properly addressed</td>
</tr>
<tr>
<td>Arizona Department of Public Safety</td>
<td>Need to ease congestion on Interstate 19 (I-19) and Interstate 10 (I-10)</td>
</tr>
<tr>
<td></td>
<td>Daily collisions on I-19</td>
</tr>
<tr>
<td>Arizona Game and Fish Department</td>
<td>Avoid fragmentation of habitat and wildlife corridors</td>
</tr>
<tr>
<td></td>
<td>Minimize impact of new development</td>
</tr>
<tr>
<td></td>
<td>Protect federally-listed and special status species</td>
</tr>
<tr>
<td></td>
<td>Limit spread of buffalo grass and loss of hunting space</td>
</tr>
<tr>
<td>Arizona State Historic Preservation Office</td>
<td>No concerns</td>
</tr>
<tr>
<td>LOCAL</td>
<td></td>
</tr>
<tr>
<td>City of South Tucson</td>
<td>Northern alignment</td>
</tr>
<tr>
<td></td>
<td>New rail connection to move rail activity away from South Tucson</td>
</tr>
<tr>
<td>Pima County</td>
<td>Land use assumptions (employment) in the study area</td>
</tr>
<tr>
<td></td>
<td>Interstate freight traffic growth</td>
</tr>
<tr>
<td></td>
<td>I-19 connection near Pima Mine Road</td>
</tr>
<tr>
<td></td>
<td>Minimize effect on Conservation Land System</td>
</tr>
<tr>
<td></td>
<td>Access undeveloped State Lands</td>
</tr>
<tr>
<td></td>
<td>Connect to Aerospace Parkway</td>
</tr>
<tr>
<td></td>
<td>Avoid sensitive archeological sites</td>
</tr>
<tr>
<td></td>
<td>Access Desert Diamond Casino</td>
</tr>
<tr>
<td></td>
<td>Economic Opportunities for Tohono O'odham Nation</td>
</tr>
<tr>
<td></td>
<td>Link jobs in aerospace, defense and mining to housing</td>
</tr>
<tr>
<td></td>
<td>Accommodate Sahuarita East Conceptual Area Plan (SECAP)</td>
</tr>
<tr>
<td></td>
<td>Keep connection as short as possible</td>
</tr>
<tr>
<td></td>
<td>Expedite route to/from Port of Tucson from Mexico</td>
</tr>
<tr>
<td></td>
<td>Support increase in Tucson economic growth</td>
</tr>
<tr>
<td></td>
<td>Utility corridor on Old Vail Highway</td>
</tr>
</tbody>
</table>
Public Scoping

Public Scoping Meetings
Members of the public were notified of and invited to participate in the scoping process for the Sonoran Corridor. Public scoping meetings were held in both Tucson and Sahuarita to provide accessible options for all willing and interested participants. The meetings were designed to inform the public of the project and 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. Forty-five people participated in each of the two public meetings. Materials made public during the scoping process – including meeting notifications, PowerPoint presentation, display boards, comment forms and sign-in sheets – are included in the appendices of this summary report.

Notification
- Public service announcement on KPYT Radio in English and in Hiaki, the native language of the Pascua Yaqui community - May 17–June 6, 2017
- Newspaper advertisement published in Arizona Daily Star’s Spanish language publication, La Estrella, and The Runner, a publication on the Tohono O’odham Nation - May 19, 2017
- Invitation emailed to elected officials - May 22, 2017
- Newspaper advertisement published in Arizona Daily Star - May 23, 2017
- Newspaper advertisement published in Sahuarita Sun - May 24, 2017
- News release emailed by ADOT - May 23, 2017 and June 5, 2017

Copies of notification materials are included in Appendix A.

Media Coverage
Information about the public scoping meetings was published and broadcast through a variety of media outlets to reach a broad population base. Each medium published or broadcast the meeting announcement once. Dates of the announcements are noted below:

Arizona Daily Star – May 29, 2017
Arizona Daily Independent – May 31, 2017
KOLD TV Channel 13 – June 5, 2017
KGUN News Channel 9 – June 5, 2017
KUAT Arizona Public Media – June 5, 2017
Title VI

Title VI of the 1964 Civil Rights Act regulations provides that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance.” Related federal statutes and regulations require ADOT’s Title VI/Nondiscrimination Program to include nondiscrimination protection on the basis of age, sex, disability and income status in all ADOT programs or activities.

A display board, brochures and survey cards were displayed and made available at the meeting regarding Title VI. The public was actively encouraged to complete survey cards, and 42 cards were received at these meetings and provided to ADOT’s Communications team. In addition, Title VI language was included in the newspaper advertisements and press release inviting the public to attend the meeting.

Limited English Proficiency

The 2000 Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency” requires “federal agencies to examine the services they provide, identify any need for services to those with Limited English Proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.” When it comes to public consultation “…agencies shall ensure that stakeholders, such as LEP persons and their representative organization…. have an adequate opportunity to provide input”.

ADOT’s public involvement programs will strive to be innovative and proactive in engaging individuals from different cultures and backgrounds in the project-development process. LEP is a term used to describe individuals who are not proficient in the English language. Title VI and Executive Order 13166 prohibit recipients of federal financial assistance from discrimination based on national origin. Recipients of federal financial assistance are required to take reasonable steps to provide LEP individuals with meaningful access to their programs, activities and services. The LEP guidance included in this Scoping Summary is aligned with ADOT’s Language Access Plan, prepared by ADOT’s Civil Rights Office.

Spanish language versions of all materials associated with the Scoping Meetings in this study were provided. Additionally, Spanish translators were present at scoping meetings and the study webpage is equipped with a translation function to accommodate Spanish speakers.

Environmental Justice (EJ)

In 1994, Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations was issued. EJ “is the fair treatment and meaningful involvement of all people, particularly minority, low-income and indigenous populations, in the environmental decision-making process.” All ADOT’s planning projects that include Federal funding follow the NEPA process, which also includes requirements for identifying and engaging EJ communities to increase equity in transportation throughout the decision-making process.

In the context of transportation, effective and equitable decision-making depends on understanding and properly addressing the unique needs of different socio-economic groups. The USDOT’s EJ strategy identifies three fundamental principles of EJ that guide USDOT actions:

In January 2018
• 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.
• To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

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

The purpose of the 1994 Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” is to focus federal attention on the environmental and human health effects of federal actions on minority and low-income populations with the goal of achieving environmental protection for all communities.

The USDOT Order 5610.2(a) requires that EJ principles be considered in all USDOT programs, policies, and activities.

This Tier 1 EIS process complies with EJ requirements.

**Americans with Disabilities Act**

The Americans with Disabilities Act of 1990 (ADA) stipulates that people with disabilities be involved in developing and improving public services. In highway planning, collaboration with persons with disabilities is essential for developing access points beyond those that are required. All events held for programs or projects with federal-aid funds and open to the public must be made accessible to everyone, including persons with disabilities. All scoping meetings associated with this study were ADA compliant.

**Meeting Format, Materials and Presentation**

At the public meeting, participants were provided a fact sheet and comment form. Participants were asked to:

- Sign in
- Fill out voluntary self-identification cards per Title VI requirements
- Fill out and leave completed comment forms at the meeting or provide comments by speaking with a court reporter or writing comments on the roll plot maps
- Provide comments after the meeting by:
  - Placing a pin on an online study vicinity map and providing comments at gg.mysocialpinpoint.com/sonorancorridor. See Appendix E
  - Completing a comment form online at azdot.gov/sonorancorridor
  - Calling: 1.855.712.8530 (Toll-free, bilingual)
  - Emailing: sonorancorridor@azdot.gov
  - Mailing to: Sonoran Corridor Tier 1 EIS Study team, c/o ADOT Communications,
Aerial-plan-view roll plot maps were provided at tables staffed by study team members, and additional displays mounted on boards were placed in the meeting rooms. Participants were encouraged to view the displays, ask questions and submit comments. Locations of interest or concern were identified by agencies and the public as shown in Figure 2. Suggested corridor routings by the public are depicted in Figure 3.

A presentation began at 6 p.m. Presenters were Kimberly Noetzel and Carlos Lopez of ADOT. The presentation included:

- Welcome
- Title VI and survey card information
- Sonoran Corridor background
- Overview of environmental review process
- Project timeline
- Ways to comment

After the presentation, attendees were encouraged to speak with team members and visit information stations to learn more about the project, which many did. Stations featured displays that focused on welcoming attendees, the Tier 1 EIS process, environmental issues being considered, the Purpose and Need for the study, a study vicinity map, and a comparison of Tier 1 and Tier 2 studies. The meeting adjourned at 7 p.m.

Public meeting materials were posted to the Arizona Department of Transportation project website at [azdot.gov/sonorancorridor](http://azdot.gov/sonorancorridor).
Figure 2 – Locations of Interest/Sensitive Areas Noted by Agencies and Public
Figure 3 - Corridor Suggestions during Scoping
Comments and Questions from the Public

Over 92 comments and questions were received on comment forms, emails, social pinpoint online forum comments, and phone calls during the Scoping comment period between May 12, 2017 and July 15, 2017.

The comment form asked participants to rank in order of importance a series of topics associated with the study. Those were:

- **Question #1** – Please tell us what challenges you experience today, or anticipate in the future, when traveling in the vicinity of Interstate 10 and Interstate 19 south of the Tucson International Airport:
  - Traffic congestion and delays
  - Lack of connectivity between highways and from highways
  - Sharing highways with heavy commercial truck traffic
  - The absence of alternative forms of transportation from what exists today
  - Other issues

- **Question #2** – The study team will evaluate and consider potential impacts on many human environmental factors. Please rank the following in order of importance to you:
  - Neighborhoods, diverse communities and residents
  - Economic development and growth
  - Preserving existing land use
  - Preserving public parks and recreation sites
- Cultural sites
- Historic sites
- Archeological sites
- Other issues

- Question #3 – The study team will also consider and evaluate the potential impacts on many natural environmental factors. Please rank the following in order of importance to you:
  - Air quality
  - Biological resources
  - Geology, soils and farmland
  - Historic structures and archeological sites
  - Noise and vibration
  - Visuals and aesthetics
  - Water resources
  - Other issues

- Question #4 asked participants to identify areas within the study boundaries to be avoided and provided space for comment

- Question #5 provided space for additional comments

Summary of Public Comments
A summary of the comments received from the public through all forms of input, including questionnaires that asked participants to rate the relative importance of factors, provided the following aggregate rankings from both public scoping meetings, with 1) being the highest in importance.

1. Traffic congestion and delays
2. Sharing highways with commercial truck traffic
3. Lack of connectivity
4. Impact on neighborhoods, residences and diverse communities
5. Air quality
6. Visuals and aesthetics
7. Alternative forms of transportation (rail, bicycle routes, etc.)
8. Geology, soils and farmland
9. Preserving existing land use
10. Protection of cultural sites

More comprehensive public comments are included in Appendix F.
Appendices

A: Notification
B: Meeting Materials
C: Meeting Displays
D: PowerPoint Presentation
E: Agency Comments
F: Public Comments
G: Cooperating Agency Responses
Appendix A - Notification
PUBLIC SCOPING MEETINGS
The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) invite you to attend a public scoping meeting as part of the Sonoran Corridor Tier 1 Environmental Impact Statement (EIS). The proposed Sonoran Corridor is congressionally designated as a high-priority, high-capacity corridor that would connect Interstate 10 to Interstate 19 south of the Tucson International Airport.

Scoping is an early and important step in the environmental review process. During scoping, the public and agencies have an opportunity to share their ideas and concerns, which help determine the “scope” or range of issues to be addressed in the environmental document, also referred to as the Tier 1 Environmental Impact Statement. As part of the scoping process, ADOT is hosting public meetings in the city of Tucson and the town of Sahuarita.

TIER 1 ENVIRONMENTAL IMPACT STATEMENT
YOUR INPUT IS NEEDED!

Public Meetings - We want you to participate and tell us what you think!

Wednesday, June 7, 2017 | 5:30 to 7 p.m.
Presentation begins at 6 p.m.
Radisson Hotel Tucson Airport
4550 S. Palo Verde Road, Tucson, AZ 85714

Thursday, June 8, 2017 | 5:30 to 7 p.m.
Presentation begins at 6 p.m.
Santa Cruz Valley United Methodist Church
71 E. Sahuarita Road, Sahuarita, AZ 85629

The public meeting will begin with an informational presentation, and continue with an open-house format. Study team members will be available to answer questions and listen to your input. The same information will be presented at each meeting. For more information about the meetings, please visit: www.azdot.gov/sonorancorridor.

Can’t make a meeting?
Please submit comments by July 15, 2017 to be included in the summary of public comments.

Toll-free bilingual project information line:
1.855.712.8530

Email:
sonorancorridor@azdot.gov

Mail comments:
Sonoran Corridor Tier 1 EIS Study Team
c/o ADOT Communications
1655 W. Jackson St., Mail Drop 126F
Phoenix, AZ 85007

Website:
azdot.gov/sonorancorridor

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De acuerdo con el título VI de la Ley de Derechos Civiles de 1964 y la Ley de Estadounidenses con Discapacidades (ADA por sus siglas en inglés), el Departamento de Transporte de Arizona (ADOT por sus siglas en inglés) no discrimina por raza, color, nacionalidad, edad, género o discapacidad. Personas que requieren asistencia (dentro de lo razonable) ya sea por el idioma o por discapacidad deben ponerse contacto con Kim Noetzel al 602.712.2122 o knoetzel@azdot.gov. Las solicitudes deben hacerse lo más pronto posible para asegurar que el equipo encargado del proyecto tenga la oportunidad de hacer los arreglos necesarios.

WHAT IS THE SONORAN CORRIDOR?
The Sonoran Corridor is envisioned as a potential transportation corridor that would enhance the movement of people and freight, and facilitate regional connectivity, trade, communications and technology.

STUDY VICINITY

WHAT IS THE SONORAN CORRIDOR?
The Sonoran Corridor is envisioned as a potential transportation corridor that would enhance the movement of people and freight, and facilitate regional connectivity, trade, communications and technology.
La Administración Federal de Carreteras (FHWA por sus siglas en inglés) y el Departamento de Transporte de Arizona (ADOT por sus siglas en inglés) los invitan a asistir a una reunión pública como parte del estudio medioambiental para el Corredor Sonorense, una nueva ruta de alta capacidad y alta prioridad, designada por el Congreso, con potencial de conectar la Interestatal 19 con la Interestatal 10 al sur del Aeropuerto Internacional de Tucson (TIA por sus siglas en inglés).

El alcance público es un paso importante del proceso medioambiental. Durante la reunión, el público y las agencias tendrán la oportunidad de compartir sus ideas y preocupaciones, las cuales ayudan a determinar el alcance o rango de asuntos a tratar en el documento ambiental, referido como la Declaración del Impacto Medioambiental Nivel 1. Como parte del proceso, se llevarán a cabo reuniones públicas en el área del estudio del Corredor en Tucson y Sahuarita.

Reunión Pública

La Administración Federal de Carreteras (FHWA por sus siglas en inglés) y el Departamento de Transporte de Arizona (ADOT por sus siglas en inglés) los invitan a asistir a una reunión pública como parte del estudio medioambiental para el Corredor Sonorense, una nueva ruta de alta capacidad y alta prioridad, designada por el Congreso, con potencial de conectar la Interestatal 19 con la Interestatal 10 al sur del Aeropuerto Internacional de Tucson (TIA por sus siglas en inglés).

El alcance público es un paso importante del proceso medioambiental. Durante la reunión, el público y las agencias tendrán la oportunidad de compartir sus ideas y preocupaciones, las cuales ayudan a determinar el alcance o rango de asuntos a tratar en el documento ambiental, referido como la Declaración del Impacto Medioambiental Nivel 1. Como parte del proceso, se llevarán a cabo reuniones públicas en el área del estudio del Corredor en Tucson y Sahuarita.

Declaración del Impacto Medioambiental de Nivel 1
¡Se necesita su opinión!

¿Qué es el Corredor Sonorense?
El Corredor Sonorense podría ser una conexión de transporte destinada a mejorar el movimiento de personas y mercancías, y podría facilitar la conectividad regional, el comercio, las comunicaciones y la tecnología.

Área de estudio

¿Qué es el Corredor Sonorense?
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Área de estudio

¿Qué es el Corredor Sonorense?
El Corredor Sonorense podría ser una conexión de transporte destinado a mejorar el movimiento de personas y mercancías, y podría facilitar la conectividad regional, el comercio, las comunicaciones y la tecnología.
Study to look at potential routes for Sonoran Corridor in Tucson

Public input sought on proposed corridor connecting I-10 and I-19

TUCSON – The Arizona Department of Transportation and the Federal Highway Administration have begun a three-year environmental study of potential routes for the proposed Sonoran Corridor, which would connect Interstate 19 to Interstate 10 south of Tucson International Airport.

It begins with a comment period lasting through July 15, 2017, that encourages all members of the public to provide input on the Sonoran Corridor study area during a process known as public scoping. It is an opportunity to ask questions and share comments or concerns about topics such as potential locations for the corridor, environmental considerations, impacts on wildlife habitat or cultural resources, and possible opportunities for other transportation modes that may be considered.

Two public scoping meetings are scheduled:
• Wednesday, June 7, at the Radisson Hotel Tucson Airport, 4550 S. Palo Verde Road, Tucson
• Thursday, June 8, at the Santa Cruz Valley United Methodist Church, 70 E. Sahuarita Road, Sahuarita

Both meetings will run from 5:30 to 7 p.m., with a presentation beginning at 6 p.m.

All feedback, questions, and comments from meetings, and provided through other means, will be considered part of the study and entered into the project record.

The Sonoran Corridor has been identified as a critical transportation facility that would diversify, support and connect the economy of southern Arizona and the entire state. The Fixing America’s Surface Transportation Act (FAST Act) designated the Sonoran Corridor as a high-priority corridor, reinforcing the need to conduct a study for a future transportation facility that would potentially alleviate traffic congestion at the I-19 and I-10 traffic interchange and reduce travel distances south of the Tucson International Airport.

There is no timetable for building the Sonoran Corridor, and no funding has been identified for it.

The Notice of Intent to prepare a Tier 1 Environmental Impact Statement was published in the Federal Register on May 12, 2017, in accordance with the National Environmental Policy Act, which kicks off the formal environmental study process. The purpose of the Tier 1 Environmental Impact Statement is to identify a selected corridor alternative, which could be the no-build option.
One of the first steps of the environmental study process is to develop a Corridor Selection Report to assess a wide range of corridor alternatives, along with opportunities and constraints. Ultimately, this will result in a reasonable range of corridor alternatives that will advance into the Draft Tier 1 Environmental Impact Statement. The Draft Tier 1 Environmental Impact Statement will assess on a broad scale the potential social, economic and natural environmental impacts of the no-build option, as well as the reasonable range of corridor alternatives. Each corridor alternative will be approximately 2,000 feet wide and contain smaller segments that could advance as independent improvement projects. Smaller segments would be studied separately in a Tier 2 environmental document if a corridor alternative is selected.

 Individuals who are unable to attend one of the scoping meetings can submit written comments in any of the ways below:

Online survey: azdot.gov/SonoranCorridor

Email: SonoranCorridor@azdot.gov

Toll-free bilingual information line: 855-712-8530

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

For more information about this study, visit azdot.gov/SonoranCorridor.

**Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act (ADA)**

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May 22, 2017

Subject: Sonoran Corridor public scoping meetings

Dear Sonoran Corridor Stakeholder:

The Arizona Department of Transportation (ADOT) and Federal Highway Administration (FHWA) have initiated the environmental review process for the Sonoran Corridor, a proposed new state route that would connect Interstate 19 and Interstate 10 south of Tucson International Airport. A Tier 1 Environmental Impact Statement (EIS) is being prepared as part of this process in accordance with the National Environmental Policy Act (NEPA) and other regulatory requirements.

The Notice of Intent (NOI) for this study was published in the Federal Register on May 12, 2017, marking the start of a public comment period, which continues through July 15, 2017.

The first step in this process is to host public scoping meetings. During scoping, all members of the public have the opportunity to provide input about potentially affected resources and environmental issues that will be considered in the Tier 1 EIS. As this process begins, I would like to invite you to participate in one or both of the following public scoping meetings and encourage you to invite other members of your community to attend and provide their input:

Wednesday, June 7, 2017
5:30 to 7 p.m. | Presentation begins at 6 p.m.
Radisson Hotel Tucson Airport,
4550 S. Palo Verde Rd., Tucson 85714

Thursday, June 8, 2017
5:30 to 7 p.m. | Presentation begins at 6 p.m.
Santa Cruz Valley United Methodist Church,
70 E. Sahuarita Rd., Sahuarita 85629

The same information will be presented at each meeting. If you are unable to attend, you can review study materials and provide comments online at azdot.gov/sonorancorridor.
For additional information or if you have questions about this study, please contact Kimberly Noetzel by email at KNoetzel@azdot.gov or by calling (602) 712-2122.

On behalf of ADOT, thank you for your interest in the Sonoran Corridor.

Sincerely,

John S. Halikowski
ADOT Director

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Título VI de la Ley de Derechos Civiles de 1964 y la Ley de Americanos con Discapacidades (ADA)
De acuerdo con el título VI de la Ley de Derechos Civiles de 1964 y la Ley de Estadounidenses con Discapacidades (ADA por sus siglas en Ingles), el Departamento de Transporte de Arizona (ADOT por sus siglas en Ingles) no discrimina por raza, color, nacionalidad, edad, genero o discapacidad. Personas que requieren asistencia (dentro de lo razonable) y sea por el idioma o por discapacidad deben ponerse en contacto Kimberly Noetzel at 602.712.2122 o KNoetzel@azdot.gov. Las solicitudes deben hacerse lo más pronto posible para asegurar que el equipo encargado del proyecto tenga la oportunidad de hacer las arreglos necesarios.
Appendix B - Meeting Materials
ABOUT THE SONORAN CORRIDOR

In partnership with the Federal Highway Administration (FHWA), the Arizona Department of Transportation (ADOT) has begun a three-year environmental study to select a corridor location for the Sonoran Corridor, a proposed new transportation facility that would connect Interstate 10 (I-10) and Interstate 19 (I-19) south of the Tucson International Airport.

STUDY GOALS

- To identify the Sonoran Corridor as a high-capacity future transportation facility that would provide a link between I-10 and I-19 to enhance the efficiency of both commercial and passenger vehicle traffic in Southern Arizona.
- To establish a multimodal corridor, with the potential to enhance the movement of people and freight, support economic development and be a corridor for trade, communications and technology.
- To reach a consensus on a Selected Corridor Alternative as required by the National Environmental Policy Act (NEPA).

THE STUDY PROCESS

In May 2017, FHWA and ADOT initiated the study for the Sonoran Corridor, a proposed new corridor that would connect I-10 and I-19 south of the Tucson International Airport. The Tier 1 Environmental Impact Statement (EIS) will be prepared as part of the process to establish a preferred corridor alternative, including a “no build” option, in accordance with NEPA and other regulatory requirements. A separate Corridor Selection Report (CSR) will be prepared to help identify a range of reasonable alternatives that will be brought into the EIS for further study. The Tier 1 EIS also will compare the “no-build” option against the range of reasonable alternatives. The process will include engaging and involving stakeholder agencies, organizations and the public throughout the study.

CORRIDOR STUDY VICINITY

The Sonoran Corridor Tier 1 EIS Study Team is looking at potential 2,000-foot-wide corridors between I-10 and I-19 in the vicinity south of the Tucson International Airport to the southern boundary of the Town of Sahuarita.
ABOUT THE TIER 1 ENVIRONMENTAL IMPACT STATEMENT (EIS)

A Tier 1 EIS allows a federal agency to prepare a document that analyzes a program or large project on a broad scale. The initial phase of the study consists of a Corridor Selection Report, which assesses a wide range of corridor alternatives and options through a robust process that includes addressing environmental, geographical, socio-economic factors and other issues important in the study process to help identify a range of reasonable alternatives.

A public and agency involvement process will help the study team establish project needs, identify a range of reasonable alternatives and ultimately the preferred alternative. The study team will identify potential 2000-foot-wide corridors into which a more defined, specified alignment may fit. The Tier 1 Draft EIS will document the environmental considerations related to the range of reasonable alternatives and the “no-build” alternative to identify the preferred alternative.

SONORAN CORRIDOR STUDY PROCESS AND SCHEDULE

HOW YOU CAN GET INVOLVED

ADOT and the FHWA will engage and involve stakeholder agencies, organizations and members of the community throughout the study process. Opportunities to comment will be available through meetings and other forms of public outreach.

ADOT will hold public scoping meetings on the Sonoran Corridor Tier 1 EIS in Tucson at the Radisson Hotel Tucson Airport on June 7 from 5:30 to 7:00 p.m. and in Sahuarita at the Santa Cruz Valley United Methodist Church on June 8 from 5:30 to 7:00 p.m. to share information about the study and gather input that will help inform the process to identify the initial range of corridor alternatives.

The initial range of alternatives will be the focus of the first of two public meetings in late summer/early fall. A second public meeting in early 2018 will provide the opportunity to comment on the range of reasonable alternatives. The study team will then present a preferred alternative in the draft EIS at a public hearing in late 2018/early 2019.
DETALLES DEL CORREDOR SONORENSE

En colaboración con la Administración Federal de Carreteras (FHWA por sus siglas en inglés) el Departamento de Transporte de Arizona (ADOT por sus siglas en inglés) ha iniciado un estudio medioambiental de tres años para seleccionar la ubicación para el Corredor Sonorense, una nueva facilidad de transporte que propone conectar la Interestatal 10 (I-10) y la Interestatal 19 (I-19) al sur del Aeropuerto Internacional de Tucson.

METAS DEL ESTUDIO

• Identificar el Corredor Sonorense como una nueva facilidad de transporte con gran capacidad que proporcionará una mejor eficiencia al tráfico doméstico y comercial entre la I-10 y la I-19, en el sur de Arizona.
• Establecer un corredor multimodal con potencial de mejorar el movimiento de personas y mercancías, apoyar el desarrollo económico y ser un corredor para el comercio, las comunicaciones y la tecnología.
• Llegar a un consenso sobre una Alternativa del Corredor Selecto como lo requiere la Ley de Política Ambiental Nacional (NEPA por sus siglas en inglés).

ÁREA DEL ESTUDIO

EL PROCESO DEL ESTUDIO

En marzo del 2017, FHWA y ADOT iniciaron el estudio para el Corredor Sonorense, un nuevo corredor propuesto que conectaría la autopista I-10 y la I-19 al sur del Aeropuerto Internacional de Tucson. Se preparará una Declaración de Impacto Medioambiental Nivel 1 (EIS por sus siglas en inglés) como parte del proceso para establecer una alternativa preferida del corredor, incluyendo la opción de “no construir” según NEPA y otros requisitos regulatorios. Aparte, un Reporte de Selección de Corredor (CSR por sus siglas en inglés) se preparará para ayudar a identificar una gama razonable de alternativas para ser consideradas más adelante en el estudio. La Declaración del Impacto Medioambiental Nivel 1 (EIS por sus siglas en inglés) también incluirá una opción de “no construir”, contra la cual se comparará la gama de alternativas razones. Durante todo el proceso del estudio se incluirá la participación de las agencias y organizaciones involucradas junto con el público.

REGIÓN DEL ESTUDIO DEL CORREDOR

El equipo del estudio está buscando posibles corredores de 2-mil pies de ancho entre la I-10 y I-19 alrededor del sur del Aeropuerto Internacional de Tucson a la frontera sur de la ciudad de Sahuarita.
MÁS SOBRE LA DECLARACIÓN DEL IMPACTO MEDIOAMBIENTAL (EIS POR SUS SIGLAS EN INGLÉS)

Un Nivel 1 EIS permite a una agencia federal preparar un documento que analiza un programa o un proyecto grande en escala amplia. La primera fase del estudio consiste en un Reporte de Selección de Corredor, que evalúa una amplia gama de alternativas de corredor y opciones a través de un proceso robusto que incluye temas ambientales, geográfico, factores socio-económicos y otros temas importantes del proceso del estudio para ayudar a identificar una gama razonable de alternativas.

Un proceso de participación, pública y de agencias, ayudará al equipo del estudio establecer la necesidad, identificar una gama razonable de alternativas y determinar la alternativa preferida. El equipo de estudio identificará varios corredores potenciales de 2-mil pies de ancho en el que puede caber una nueva alineación de transporte. El Nivel 1 EIS documentará las consideraciones medioambientales relacionadas a la gama de alternativas razónales e incluirá una opción de “no construir” para identificar la alternativa preferida.

EL PROCESO Y HORARIO DEL ESTUDIO CORREDOR SONORENSE

COMO PUEDE INVOLUCRARSE

ADOT y FHWA tomarán pasos para involucrar a organizaciones, agencias, y miembros de la comunidad durante el proceso de estudio. Oportunidades para comentar estarán disponibles a través de reuniones y otras formas de divulgación.

ADOT tendrá reuniones públicas sobre la Declaración del Impacto Medioambiental Nivel 1 EIS en Radisson Hotel Tucson Airport el 7 de junio, 5:30 to 7:00 p.m. Tucson y en Santa Cruz Valley United Methodist Church el 8 de junio, 5:30 to 7:00 p.m. Sahuarita para compartir información sobre el estudio y colectar información que ayudará informar el proceso que identificará la gama inicial de alternativas para el corredor.

Help shape the future of transportation in Southern Arizona – TODAY!

Thank you for participating in the Sonoran Corridor Tier 1 Environmental Impact Statement public scoping process by completing this survey.

Public scoping is a time for our team to learn from the community prior to embarking on the environmental study. We need your input about what you feel is important within the Sonoran Corridor Study vicinity, as well as what transportation challenges you experience today and how we can address them in the future.

1. Please tell us what challenges you experience today, or anticipate in the future, when traveling in the vicinity of Interstate 10 and Interstate 19 south of the Tucson International Airport:

☐ Traffic congestion and delays
☐ Lack of connectivity between highways and from highways to local streets
☐ Sharing highways with heavy commercial truck traffic
☐ The absence of alternative forms of transportation from what exists today (e.g. transit, bicycle routes, passenger rail, etc.)
☐ Other issue(s) not addressed above __________________________________________

2. The study team will evaluate and consider potential impacts on many human environmental factors. Please rank the following in order of importance to you:

☐ Neighborhoods, diverse communities, and residences
☐ Economic development and growth
☐ Preserving existing land use
☐ Preserving public parks and recreation sites
☐ Cultural sites
☐ Historic sites
☐ Archeological sites
☐ Other issue(s) not addressed above __________________________________________
3. The study team will also consider and evaluate the potential impacts on many natural environmental factors. Please rank the following in order of importance to you:

☐ Air quality
☐ Biological resources (such as wildlife, plants and habitats)
☐ Geology, soils and farmland
☐ Historic structures and archeological sites
☐ Noise and vibration
☐ Visual and aesthetics
☐ Water resources (rivers, washes, floodplains and drainage)
☐ Other issue(s) not addressed above

4. Identify the areas or resources within the Sonoran Corridor Study vicinity that you feel should be avoided or are important for the study team to consider:

______________________________________________________________________________
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5. Additional Comments:

______________________________________________________________________________
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For more information about the Sonoran Corridor Tier 1 Environmental Impact Statement study, please visit the ADOT study website at azdot.gov/sonorancorridor. Comments can also be provided by toll-free phone calls to 1.855.712.8530 or by email: sonorancorridor@azdot.gov.

You can complete this form and return it by mail to:

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

The public comment period during scoping runs until July 15, 2017. To ensure your input is included in the study record, your completed form must be postmarked by July 15, 2017. You can also scan and email your completed comment form to sonorancorridor@azdot.gov before this public comment period ends.
La Administración Federal de Carreteras/El Departamento de Transporte de Arizona

Corredor Sonorense
Declaración del Impacto Medioambiental Nivel 1.

Ayude a formar el transporte en el sur de Arizona—¡HOY!

Gracias por participar en el proceso de alcance público, al contestar esta encuesta para el estudio del Corredor Sonorense Declaración del Impacto Medioambiental Nivel 1. El alcance público es cuando nuestro equipo aprende sobre la comunidad antes de embarcar en el estudio medioambiental. Necesitamos su opinión sobre lo que usted crea que sea de importancia sobre la región del Corredor Sonorense, así como los desafíos de transporte con los que se encuentra hoy y cómo podemos abordarlos en el futuro.

Clasifique cada uno de los siguientes temas con una escala de 1 a 5, 1 siendo lo MÁS importante y 5 lo MENOS importante.

1. Por favor, cuéntenos los desafíos que usted se ha encontrado, o anticipa en el futuro cuando a viaja en las inmediaciones de la Interestatal 10 y la Interestatal 19 al sur del Aeropuerto Internacional de Tucson:
   - Congestión de tráfico y retrasos
   - Falta de conectividad entre autopistas o falta de conectividad de autopistas a calles locales.
   - Compartiendo autopistas con tráfico de camiones comerciales
   - La falta de medios de transporte alternativos frente a lo que existe hoy en día (como tránsito, rutas de bicicleta, trenes pasajeros, etc.)
   - Otros asuntos no abordados anteriormente _____________

Clasifique cada uno de los siguientes elementos en una escala de 1 a 8, 1 siendo lo MÁS importante y 8 lo MENOS importante

2. El equipo del estudio evaluará y considerará los posibles impactos ambientales humanos. Por favor clasifique los siguientes elementos en orden de importancia para usted:
   - Barrios/Vecindades/Colonias, comunidades diversas y residencias
   - Desarrollo económico y crecimiento
   - Preservar el uso del suelo existente
   - Preservar parques públicos y sitios de recreación
   - Sitios culturales
   - Sitios históricos
   - Sitios arqueológicos
   - Otros asuntos no abordados anteriormente _____________

Para obtener más información sobre el estudio del Corredor Sonorense y la Declaración del Impacto Medioambiental Nivel 1, visite: azdot.gov/sonorancorridor.
3. El equipo del estudio también considerará y evaluará los posibles impactos ambientales naturales. Por favor clasifique los siguientes elementos en orden de importancia para usted:

- Calidad de aire
- Recursos biológicos (tales como vida silvestre, plantas y hábitats?)
- Geología, y tierras de cultivo
- Estructuras históricas y sitios arqueológicos
- Ruido y vibraciones
- Visual y estéticas
- Recursos hídricos (ríos, lavados, llanuras de inundación y drenaje)
- Otros asuntos no abordados anteriormente

4. Identifique las áreas o recursos dentro de la región del Estudio del Corredor Sonorense que deben evitarse o son importantes para que el equipo del estudio considere:

5. Comentarios adicionales:
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<tr>
<th>Name (Nombre)</th>
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Completion of this sign-in sheet is voluntary and helps the study team keep an accurate record of meeting attendance. Under state law, any identifying information provided above will become part of the public record and, as such, must be released to any individual upon request.
PUBLIC SIGN-IN SHEET (REGISTRO PÚBLICO)

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Completion of this sign-in sheet is voluntary and helps the study team keep an accurate record of meeting attendance.
Under state law, any identifying information provided above will become part of the public record and, as such, must be released to any individual upon request.
Appendix C - Meeting Displays
WELCOME
PLEASE SIGN IN

YOU CAN PROVIDE COMMENTS FOR THE RECORD BY:

- Filling out a comment form
- Speaking with the Court Reporter
- Placing a pin & commenting at gg.socialpinpoint.com/sonorancorridor
- Completing a comment form at azdot.gov/sonorancorridor

BIENVENIDOS
POR FAVOR REGÍSTRENSE

PUEDEN HACER SUS COMENTARIOS:

- Completando la forma para comentarios públicos
- Ofreciendo sus comentarios al reportero/taquígrafo
- Colocando un marcador y comentando en gg.socialpinpoint.com/sonorancorridor
- Completing the form online at azdot.gov/sonorancorridor

FOR MORE INFORMATION/PARA OBTENER MÁS INFORMACIÓN: azdot.gov/sonorancorridor
ADOT Project No.: P9100 0SP/ Federal Aid No. 410-A (BF1)
WHAT IS A TIER 1 ENVIRONMENTAL IMPACT STATEMENT?

A Tier 1 Environmental Impact Statement (EIS) is a decision-making document that enables federal agencies to identify constraints and opportunities on proposed projects through technical analysis and outreach to agencies and the public.

In a tiered environmental process, a Tier 1 EIS considers broad corridors and issues that set the stage for future Tier 2 environmental studies that evaluate specific transportation alignments.

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<tr>
<th>YEAR 1</th>
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<tr>
<td>CORRIDOR SELECTION REPORT (CSR)</td>
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<td>DATA GATHERING</td>
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<td>WE ARE HERE</td>
<td>SCOPING MEETINGS</td>
<td>INFORMATION MEETING</td>
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<td>INFORMATION MEETING</td>
<td>HEARINGS</td>
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With agency and public input, a corridor selection study progressively narrows the potential corridors from an original “universe” of possibilities to a range of reasonable build alternatives that moves into the Tier 1 EIS along with a “No-Build” alternative. In the Final Tier 1 EIS the lead federal agency makes a decision on the selected alternative. If a build alternative is selected it allows local jurisdictions to incorporate the selected corridor into local plans and the project is eligible for federal funding opportunities. The process sets the stage for future Tier 2 environmental studies that look at project-level analysis with a specific alignment.
ENVIRONMENTAL ELEMENTS

The following environmental elements will be studied in the Environmental Impact Statement:

- Air Quality
- Archaeological, Historic and Cultural Resources
- Biological Resources
- Hazardous Materials
- Impact on conservation lands and waterways
- Impact on public land, e.g. parks, recreation areas, historic sites
- Land Ownership, Jurisdiction, and Land Use
- Noise
- Social and Economic Considerations
- Utilities
- Visual Resources
- Water Resources
- Wildlife refuge

FOR MORE INFORMATION/PARA OBTENER MÁS INFORMACIÓN: azdot.gov/sonorancorridor
ADOT Project No.: P9100 05P / Federal Aid No. 418-A (DR)
HELP US DEFINE THE PURPOSE AND NEED STATEMENT

The Purpose and Need Statement is a fundamental part of the National Environmental Policy Act (NEPA) process and the foundation of the Tier 1 EIS. The Purpose and Need provides the basis for identifying, evaluating, and screening corridor alternatives and will be a key component in selecting a Preferred Alternative for the Sonoran Corridor. The Purpose and Need Statement is based on key transportation-related problems and issues identified in the designation of the Sonoran Corridor as a potential future transportation facility, and through agency and public input received during the scoping process.

THE PRELIMINARY PURPOSE OF THE PROJECT IS TO:

- Provide a high-priority, access-controlled, transportation corridor
- Reduce commercial and commute travel times and cost
- Enhance access to the high-capacity transportation network to support economic vitality
- Support improved regional roadway, rail and aviation mobility for people, goods, and services
- Improve access to Tucson International Airport and other major employment and population centers

THE PRELIMINARY NEED FOR THIS PROJECT RESULTS FROM THE FOLLOWING ISSUES AND OPPORTUNITIES:

- Population and employment growth
- Increasing congestion and travel time unreliability
- System linkages and regional interstate mobility
- Access to existing and future economic activity centers
TIER 1 VS. TIER 2 ENVIRONMENTAL STUDIES

**Tier 1 Environmental Study - Current**

Evaluates wide corridors in multiple locations, at a program level, within which a new transportation facility could be located.

Outcome: Select a single corridor within which an alignment would be identified during Tier 2.

**Tier 2 Environmental Study - Future**

Alignment and width are refined to minimize impacts.

Evaluates design concepts for specific alignments within the corridor, such as 400 feet for a typical freeway alignment.

Outcome: Select an alignment and enable permitting for that alignment.
Appendix D - PowerPoint Presentation
TIER 1 Environmental Impact Statement

Scoping

FEDERAL HIGHWAY ADMINISTRATION
AND ARIZONA DEPARTMENT OF TRANSPORTATION

June 7 and 8, 2017
TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 AND THE AMERICANS WITH DISABILITIES ACT (ADA)

Pursuant to Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act (ADA), ADOT does not discriminate on the basis of race, color, national origin, age, sex or disability. Persons who require a reasonable accommodation based on language or disability should contact Kimberly Noetzel at 602.712.2122 or at Knoetzel@azdot.gov. Requests should be made as early as possible to ensure the State has an opportunity to address the accommodation.

De acuerdo con el título VI de la Ley de Derechos Civiles de 1964 y la Ley de Estadounidenses con Discapacidades (ADA por sus siglas en inglés), el Departamento de Transporte de Arizona (ADOT por sus siglas en inglés) no discrimina por raza, color, nacionalidad, edad, género o discapacidad. Personas que requieren asistencia (dentro de lo razonable) ya sea por el idioma o por discapacidad deben ponerse contacto con Kimberly Noetzel al 602.712.2122 o Knoetzel@azdot.gov. Las solicitudes deben hacerse lo más pronto posible para asegurar que el equipo encargado del proyecto tenga la oportunidad de hacer los arreglos necesarios.
Title VI Survey Cards

• Self-identification survey cards are available at this meeting

• ADOT asks that you fill one out and turn it in before you leave

• The information you provide helps ADOT determine who attends public meetings
Title VI Survey Cards

- The information is anonymous
- The information enables ADOT to fulfill federal reporting requirements from the Federal Highway Administration (FHWA)
- Completing the survey is voluntary
Welcome

- Sonoran Corridor Background
- Overview of Environmental Review Process
- Project Timeline
- Ways to Comment
High Priority Corridor

- Previous Related Studies in Pima County
- Fixing America’s Surface Transportation (FAST) Act 2015
  - Designates the Sonoran Corridor as a high priority corridor on the National Highway System, between I-10 and I-19 south of Tucson International Airport
- Potential to diversify, support and connect economy of Southern Arizona and the State
What is a Tier 1 EIS?

• A high-level, programmatic analysis
• Looks at potential corridors, not specific alignments
• Prepares study team for future, project-level analysis
• Enhances eligibility for federal funding for Tier 2 environmental studies and preliminary engineering
• Allows affected jurisdictions to incorporate corridor into local plans
What is a Tier 1 EIS?

- Evaluates multiple 2,000-foot-wide corridors into which a new transportation facility would be located
- Mitigation strategies only for identified impacts
- A single corridor is selected to be evaluated in greater detail in a Tier 2 EIS
What is a Tier 2 EIS?

• Evaluates potential specific alignments within the corridor selected in Tier 1
• Selection of an alignment to enable permitting process to begin
• Specific mitigation actions are required for identified impacts
What is a Corridor Selection Report?

• Screening process to identify a “range of reasonable alternatives” from among a “universe of alternatives”

• Uses progressively more detailed evaluation process

• Final range of reasonable alternatives and the no-build alternative are carried forward for further analysis in the Tier 1 EIS
Project Scoping

- The May 12th publication of the Notice of Intent started the scoping period which ends July 15th
- Scoping is the first step of the environmental review process
- Agencies and Public can share their ideas and concerns to help determine the “scope” or range of issues addressed
- Establishes the basis for the project Purpose and Need
Purpose and Need

• Fundamental to the NEPA process and guiding the Tier 1 EIS
• Used to identify and evaluate alternatives and select a preferred alternative
Purpose and Need

• The preliminary need is to address:
  o increasing population and employment growth
  o increasing congestion
  o access to activity centers

• The preliminary purpose is to provide a high capacity transportation corridor that can:
  o reduce travel times and cost
  o improve regional mobility
  o enhance economic vitality
## Key Milestone Timeline

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<th>Milestone</th>
<th>Timeline</th>
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<td>NOTICE OF INTENT (NOI)</td>
<td>Complete - Issued May 12, 2017</td>
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<tr>
<td>SCOPING</td>
<td>Mid May - July 2017</td>
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<tr>
<td>PURPOSE AND NEED</td>
<td>Summer 2017</td>
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<td>UNIVERSE OF CORRIDORS</td>
<td>Fall 2017</td>
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<td>RANGE OF REASONABLE CORRIDORS</td>
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<td>CORRIDOR SELECTION REPORT</td>
<td>Spring 2018</td>
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<td>DRAFT TIER 1 EIS</td>
<td>Winter 2018/2019</td>
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<td>FINAL TIER 1 EIS/ROD</td>
<td>Winter 2019/2020</td>
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Summary

- Project Scoping is the first step in Environmental Review to identify issues and opportunities
- Scoping identifies issues, opportunities and helps define Purpose and Need
Summary

- Purpose and Need helps identify, evaluate and select the preferred alternative
- Please provide comments by July 15, 2017
- For more information:
  - azdot.gov/sonorancorridor
Comment Today

You can provide comments for the record by:

• Filling out a comment form
• Speaking with the Court Reporter
• Placing a pin & commenting at gg.mysocialpinpoint.com/sonorancorridor
• Completing a comment form online at azdot.gov/sonorancorridor
Comment after the meeting

Please submit comments by JULY 15, 2017 to be included in the summary of public comments.

- **Call:** 1.855.712.8530 *(Toll-free, bilingual)*
- **Email:** sonorancorridor@azdot.gov
- **Mail:** Sonoran Corridor Tier 1 EIS Study team, c/o ADOT Communications, 1655 W. Jackson St., Mail Drop 126F, Phoenix, AZ 85007
- **Web:** azdot.gov/sonorancorridor
Project Contacts

CARLOS LOPEZ
Project Manager
ADOT Multimodal Planning Division
clopez@azdot.gov
602-712-4786

KIM NOETZEL
Assistant Communications Director for Community Relations
ADOT Communications
knoetzel@azdot.gov
602-712-2122

TREMAINE WILSON
FHWA
tremaine.wilson@dot.gov
602-382-8970
Appendix E - Agency Comments
Sonoran Corridor Tier 1 EIS Agency Scoping Meeting
Pima Association of Governments, 1 East Broadway
Tucson, AZ – June 7, 2017

Sixto Molina, South Tucson City Manager

Recommends avoiding a route adjacent to public schools because of trucks carrying hazardous materials. Valencia Road is currently a major road for trucks near many Sunnyside schools. Roads have been closed due to truck hazards. Consider safety for populations when this roadway is being designed. Using Old Vail connection road would make sense to stay away from population centers.

Priscilla Cornelio, Pima County Director of Transportation

PAG region has said altogether that they support Sonoran Corridor project and doing studies for the project. Asked if freight and rail will be considered in the study process. Asked if Union Pacific Railroad had been engaged by the study team.

John Moffatt, Pima County Economic Development Director

Focus of Pima County’s study was on movement of commerce, providing a south entrance to the Tucson International Airport, and a logistics focus in the area that’s being studied. Freight is an important aspect. Pima County has talked with Union Pacific Railroad. This would be an employment center in the area south of the airport, where Tucson is expected to experience
population growth. There are many vacant areas that can be developed and there needs to be access to those areas. The goal is to be inclusive. They are projecting heavy industry to be in this area. The movement of people from residential to business areas is important. There are opportunities to help the airport.

Pima County is working on utility corridor on Old Vail Connection alignment. TEP is part of planning process. Important to cut down on stop and go traffic in populated areas. Reducing travel times by 40% saves time and money. Pima County conducted an economic impact study that forecasts a $32 billion impact on Tucson economy. Regardless of where route goes, it will have major impact.

M.J. Dillard, Town of Sahuarita Public Works Director

Sahuarita has done studies for decades and they address preliminary needs to reduce travel times, getting people to I-19 faster. It would help economic development. This opportunity would allow Sahuarita to grow as a community. El Toro road has been identified by the Sahuarita Town Council as a preferred point of connection at I-19. Effort would include PAG land use study.

Victor Gonzalez, Town of Sahuarita Economic Development Director

Projects that would benefit and be enhanced by a corridor connecting at El Toro Road include Rancho Sahuarita phases 4
through 9, which contain 950 acres to be developed, including 95,000 square-feet of retail. The Town Council approved a Community Facilities District to fund infrastructure for this region. A new corridor will support movement of goods and strengthen regional connectivity.

**Robin Raine, City of Tucson Deputy Director of Transportation**

Purpose and need has been captured, we also need to include commuters. South of I-10 is seen as major growth area and it is important to accommodating people living in Vail and Tucson. Study purpose should include commuters. Supports potential corridor and thanked ADOT and FHWA for being broad in their study area.

**Mike Smejkal, Tucson Airport Authority Senior Development Director**

Passenger or cargo traffic, connectivity to airport would improve access for multimodal component including passenger and cargo traffic. The airport is working on numerous studies consistent with this development opportunity. A future highway is great opportunity to move all common initiatives forward. TAA is working on their own EIS right now for safety enhancement projects. TIA has lots of vacant land and development opportunity. Documents have been shared with team.
Mark Pugh, Tohono O’odham Nation San Xavier District Principal Planner

Pima County did an excellent job of working with the San Xavier District community – staff, allottees, community members. They were open to hearing about corridor opportunity. In December 2013, the San Xavier District Council voted in principle to support a new corridor. The San Xavier District wants to hear more about the study. They’ve seen drawings showing a corridor away from the airport. Excited to have opportunity to have a corridor in San Xavier District.

Gerald Fayuant, Tohono O’odham Nation Economic Development Director

There needs to be change on the Tohono O’odham Nation to bring economic development opportunities. TON leaders are very supportive of San Xavier District’s comments. They understand how significant this proposed project can be, they welcome opportunity to look at route through San Xavier District. They want to make sure they are considered for potential route through the district.

Chip Lewis, Bureau of Indian Affairs Environmental Protection Specialist

ADOT needs to work with tribes, they are sometimes not familiar with the BIA processes. In the end, BIA can’t consent right of way without consent from tribes. BIA advocates for tribes.
**Arizona State Land Department** – (Representative was on the phone from Phoenix. Did not capture a name during the meeting. Working to track it down)

State land is fully supportive of Sonoran corridor. They see this as a great opportunity to gain access to their land for economic development. Look forward to working with agencies.

**Arizona Department of Environmental Quality – Brian P.**
(Working to get Brian’s last name and title)

Wants to make sure air quality gets addressed in this process and they can assist if needed.

**Linda Marianito – Western Area Power Administration**

Environmental Manager

WAPA has a major transmission line that runs through area. Try to pick an area that minimizes impact. On other projects they have worked to make sure they maintain access to their structures. There is a large transmission upgrade project coming up to be aware of.

**Capt. Benjamin Buller – Arizona Department of Public Safety**

The need to ease traffic congestion at I-19 and I-10 is already established. This is currently the heaviest traveled area with a high number of collisions. It will be important to DPS how plans to extend State Route 210 east to connect with I-10 works with this study. Currently, I-19 is over capacity, they respond on a daily basis to traffic collisions because of this. What are plans to ramp up capacity in Southern Arizona?
Kristin Terpening – Arizona Game and Fish Department
Habitat Specialist

Concerned about fragmentation of habitat and loss of habitat due to development of land. As development occurs, do what needs to be done to minimize impacts. Spread of buffel grass and loss of hunting space are also concerns.

###
July 11, 2017

Steven Hogan, PE, Project Manager
Sonoran Corridor Tier I Study Team
c/o Arizona Department of Transportation, Communications
1655 W. Jackson Street, Mail Drop 126F
Phoenix, Arizona 85007

Re: Sonoran Corridor Environmental Impact Study, Input on Land Use Model

Dear Mr. Hogan:

Pima County and the City of Tucson appreciate the opportunity to comment on the land use model for this study and understand the importance of using accurate and reliable population and employment projections to determine future traffic projections. We understand from our last meeting that you plan to use the Pima Association of Governments (PAG) Land Use Model as the starting point and are seeking input from area jurisdictions regarding the model assumptions and projections. Both jurisdictions have looked closely at the employment projections for the “PT” 2045 Scenario in the PAG Land Use Model and offer that many changes have occurred within the study area since the employment modeling was originally done. As a result, and based on our review, we believe certain projections are either under- or overestimated and do not sufficiently reflect the changes in land use and infrastructure in the study area. Our main observations are as follows:

1. The model appears to significantly underestimate the employment levels in the Transportation Analysis Zones (TAZs) that include the County’s preferred alignment located generally along Pima Mine Road, Alvernon Way and Old Vail Connection Road. The model estimates only about 10,000 new jobs in this area. We believe this estimate is too low given the land use designations and infrastructure investment in this area and active employment-generating economic development efforts of the County, City, Tucson Airport Authority (TAA), University of Arizona and others. Specifically, not factored into the modeling are the following: a) Pima County Economic Development Plan initially adopted by the Board of Supervisors on August 11, 2015 and updated on November 22, 2016; and b) Pima County’s Comprehensive Plan Update, Pima Prospers, adopted by the Board in May 19, 2015, which includes the Tucson International Airport/ Interstate 10 Economic Development Area designation. Additionally, not factored into the projections for this area is the completion of substantial
roadway, sewer, water and dry utility infrastructure, with more planned and funded. Examples include the $12.5 million investment by regional partners to construct the Aerospace Parkway and another $10 million funded for expansion of the Parkway, which is currently in design with a planned completion date of March 2018. A major regional sewer line expansion and extension also has dedicated funds of $46 million and is currently under construction in the downtown area and in the design stage for the area south of Tucson International Airport with construction starting in October 2017 and completion along Old Vail Connection to Wiimot projected by March 2018. These efforts, not present at the time the modeling was done, further enhance the employment potential of the area, which already benefitted from the presence of multi-modal air and rail infrastructure.

2. The model appears to overestimate the achievable employment levels within the model time period for the TAZs located in the Town of Sahuarita and east of the current Town boundary in unincorporated Pima County, primarily on State Trust Land property. The model estimates over 13,000 new jobs in this area by 2045, which seems quite speculative at this time given the lack of existing supporting roadway, sewer, water and utility infrastructure or committed funding for the necessary improvements to support this level of employment.

3. The model needs to account for existing interstate freight traffic and the growth expected throughout the region and along the Sonoran Corridor. Freight traffic crossing the International Border at Nogales increased by five percent this past year and the growth trend is expanding. Since the vast majority of goods and produce crossing the border travel north through Tucson, our region is well positioned for significant expansion in logistics activity and increased freight. Recent significant occurrences in this area include: a) the Port of Tucson certification as an “Inland Port” with US Customs capability; b) increased investment in logistics facilities in the past year by HomeGoods, FedEx, and Consolidated Freightways; and c) the new regional distribution center for American Tire Distributors. The project study should quantify existing and projected freight traffic related to these and other facilities, along with origins and destinations, so the impacts of freight movement in the corridor are accurately assessed.

The following specific examples illustrate underestimated employment projections:

- TAZ 479, which includes Raytheon Missile Systems, shows only 2,484 new jobs by 2045 compared to 2015. Raytheon has already added 1,200 jobs since 2015, and the Arizona Daily Star reported on November 18, 2016 that Raytheon plans to add 2,000 high-paying jobs over five years. The employment projection in this TAZ should reflect Raytheon’s growth, as well as the other employers that will be adding new jobs, including Bombardier. Also expected to generate additional employment is Pima Community College’s planned expansion of their Aviation Program, and the TAA’s plans for their land holdings. Specifically, TAA and their local engineering consultant are preparing a development layout for the commercial use of 550 readily developable acres of land
along the Aerospace Parkway. There are another 500 acres of shovel ready land located on the airport property with direct runway access that are committed for additional maintenance, repair and overhaul operations similar to Ascent Aviation, which is already onsite, and for aerospace manufacturing and cargo logistics operations. Additionally, TAA owns another roughly 4,000 acres of adjacent lands with significant employment expansion potential.

- TAZ 478, which includes World View Enterprises, Vector Space Systems, and the Pima County 500-acre Aerospace Research Campus, shows only 51 new jobs by 2045. These companies have already added 100 jobs since 2015 and have committed to create 850 new jobs by 2022. Many more jobs are projected as the Aerospace Research Campus builds out.

- TAZ 651, which includes the Desert Diamond Casino, shows zero new jobs by 2045. It has been indicated the Casino is planning to build a hotel and other facilities in this area, and the San Xavier District is planning for commercial land uses at Pima Mine Road that will likely add hundreds of jobs by 2045.

- Many of the TAZs located along the County preferred alignment show zero new jobs; yet future employment generation is expected to occur throughout this area within the model time horizon. Given capacity limitations, it is reasonable to expect an expansion of existing publicly operated prison facilities or development of a private prison on entitled land owned by Corrections Corporation of America adjacent to the existing State facilities. Additionally, adoption of an economic development overlay for the Verano project, which is already entitled for residential and nonresidential uses, now allows additional opportunities for large-scale employment generating uses without further modifications to the land use plan. Beyond these specific examples, the Sonoran Corridor would undoubtedly induce, and likely accelerate, job growth in these TAZs by providing direct access to both freeways.

- There are significant inconsistencies with the employment estimates for State Land. Numerous TAZ show undeveloped State Land near the Aerospace Parkway having no employment despite advantageous positioning near the aforementioned infrastructure, which is typically the largest obstacle to development. The lands are also part of an active collaborative planning effort between the Arizona State Land Department and the City of Tucson. Given these factors, it is highly probable these lands will develop ahead of other State Land within the study area. However, many of the TAZs containing State Land east of the Town of Sahuarita show thousands of future jobs estimated, seemingly based on planned land use designation alone, despite the lack of required infrastructure or committed funding to make the improvements needed to support development. These inconsistencies within the study area need to be resolved.
These few examples highlight concerns with the employment projections that need to be resolved before traffic modeling can begin. In addition to these, there may be other issues not identified, including a general underestimation of total population growth for the region and its distribution, that require further discussion prior to proceeding with the traffic modeling.

We welcome the opportunity to work with the study team and other stakeholders regarding these issues and to develop solutions that result in accurate and reliable projections.

Sincerely,

C.H. Huckelberry
Pima County Administrator

Michael J. Ortega, P.E.
Tucson City Manager

CHH/MJO/mjk

c: Lisa Atkins, Land Commissioner, Arizona State Land Department
Honorable Edward Manuel, Chairman, Tohono O'odham Nation
Honorable Austin Nunez, Chairman, San Xavier District, Tohono O'odham Nation
Elizabeth Francisco, Chief Operating Officer, Tohono O'odham Gaming Enterprise
L. Kelly Udall, Town Manager, Town of Sahuarita
July 15, 2017

Sonoran Corridor Tier 1 EIS Study Team
c/o ADOT Communications
1655 West Jackson St, Mail Drop 126F
Phoenix, Arizona 85007

RE: Sonoran Corridor Tier 1 EIS

The City of South Tucson is pleased to provide comments regarding the scope of the Sonoran Corridor Tier 1 Environmental Impact Statement. We are located outside of the study area, but our community could be impacted by the project and therefore we are commenting on the project scope. We understand that several alternative routes will be studied, but the City of South Tucson supports Pima County's preferred alignment for several reasons:

- A more northern alignment means that any new jobs created as a result of the corridor would be closer to potential workers living in South Tucson. Job growth is critical to the economy of South Tucson.

- The county's proposed rail spur from the Nogales Highway to the main Union Pacific Railroad and Port of Tucson could create the opportunity for commuter rail to replace the existing rail line between downtown Tucson and the airport and nearby major employers. This would benefit South Tucson because the existing UPRR rail line sometimes ships hazardous materials through our community that pose a threat to our residents living nearby. A commuter rail would be much better for our community.

Thank you for the opportunity to provide scoping comments on the Sonoran Corridor Tier 1 Environmental Impact Statement. We look forward to the study and to commenting on future phases of the process.

Sincerely,

Sixto O. Molina
City Manager

cc: Carmine DeBonis, Deputy County Administrator for Public Works
    Dr. John Moffatt, Director, Economic Development Office
July 14, 2017

Sonoran Corridor Tier 1 EIS Study Team
c/o ADOT Communications
1655 West Jackson Street, Mail Drop 126F
Phoenix, Arizona 85007

Re: Sonoran Corridor Tier 1 Environmental Impact Statement Comments

Dear Study Team:

As previously indicated, Pima County will serve as a Participating Agency in the Tier 1 Environmental Impact Statement (EIS) process for the Sonoran Corridor. We appreciate the opportunity to provide input during the EIS process and believe this project is the single most important initiative for the economic enhancement of the greater metropolitan Tucson region and surrounding areas. The project has received the support of the Arizona Congressional Delegation, which led to a designation as a high priority, international trade route and future interstate. Pima County has previously submitted maps and information that documents our preferred alignment for the Sonoran Corridor.

We understand the Tier 1 EIS process will study numerous alternative routes. Pima County supports this process but believes our preferred alignment provides the greatest economic benefit and serves the greatest needs of the region. Our recommended route connects to Interstate 19 just north of Pima Mine Road, then east to the Alvernon Way alignment, then north to Old Vail Connection Road and east to the Rita Road/Interstate 10 interchange. We believe this route is preferable to other alternatives for the following reasons:

- Avoids almost any residential impacts and only minimally affects industrial parcels.
- Minimally affects the County’s Conservation Land System.
- Crosses mostly undeveloped State Lands that would become readily accessible for economic development in a primary growth area for Tucson and Sahuarita.
- Connects to the new Aerospace Parkway, Raytheon and Tucson International Airport.
• Avoids impacts to sensitive archaeological sites within the Tohono O’odham Nation, San Xavier District.
• Facilitates improved access and expansion of the Desert Diamond Casino.
• Creates opportunities for economic development and job growth in the Tohono O’odham Nation, San Xavier District.
• Links jobs and employment in the aerospace and defense industry to housing in Sahuarita, Rita Ranch and the Houghton Area Master Plan.
• Links jobs and employment at the mines near Green Valley and Sahuarita to housing in Vail and surrounding areas.
• Accommodates the transportation system concept presented in the Sahuarita East Conceptual Area Plan (SECAP) with an anticipated connection point north of Pima Mine Road.
• Reduces the distance from Pima Mine Road to Rita Road to 16 miles, which is more cost effective than other alternatives and reduces travel time, fuel consumption and pollution.
• Provides an expedited route from the Port of Tucson and The Offshore Group to trade routes in Nogales and northwest Mexico.
• Supports an estimated doubling of Tucson’s Gross Domestic Product (GDP) as calculated by an Economic Impact Analysis based on specific employment opportunities once the area served by this alignment is fully developed.

The earliest modern proposal for an east-west bypass connection between Interstate 19 and Interstate 10 occurred in the 1986 PAG Regional Transportation Plan. In 1990, The Arizona Department of Transportation (ADOT) studied several different alignments for a route between Interstate 19 and Interstate 10. ADOT reassessed this corridor in 2001 and provided an Environmental Overview, but no further action occurred. The Pima County Sonoran Corridor concept emerged following the 2010 decision by Raytheon to locate a new facility in Huntsville, Alabama rather than Tucson. As one of the largest local employers and key economic drivers of the region, Raytheon’s decision spurred action by Pima County, the City of Tucson and other officials to increase the buffer zone around Raytheon by relocating Hughes Access Road. Renamed the Aerospace Parkway, the relocated Hughes Access Road connected numerous employers and related businesses including Raytheon, the Pima County Aerospace Research Campus, and Tucson International Airport.

Because of these efforts, this area has grown as a multi-modal logistics hub with proximity to two railroad lines, two interstate highways and the International Airport. Given this positioning, a connection between Interstate 19 and Interstate 10 through this area will improve commuter travel and profoundly enhance access to industry and trade in Mexico. It will also serve as an important bypass for traffic and freight traveling on Interstate 19 and
Interstate 10 and connect the University of Arizona Technology Park and Raytheon employees to housing in Rita Ranch and areas north of Interstate 10.

While the most direct route to connect to Interstate 19 could be at the existing Papago Road/Interstate 19 interchange, it crosses Tohono O'odham lands known to contain important cultural resources. For this reason, the San Xavier District Council and the Tohono O'odham Nation expressed a lack of support for the Papago Road connection. However, they did support exploration of a southern alternative to cross part of the San Xavier District to connect to Interstate 19. The Desert Diamond Casino has also expressed support for an alignment that provides improved access to their facility and allows for future expansion to the north and east. The County preferred alignment is consistent with this input, provided support is received from the San Xavier District allottees.

Another major stakeholder in the study area is the Arizona State Land Department (ASLD) with many sections of undeveloped land without established access. Pima County and the City of Tucson have been collaborating with ASLD to plan the use of that land with a focus on high quality jobs near existing infrastructure, the Airport and Davis-Monthan Air Force Base, with a goal of avoiding conflicts between industrial and residential uses. The County's proposed route facilitates this concept by leveraging existing and planned infrastructure and rail access and promotes employment-generating industrial development on lands primarily away from residential development.

Further, the Sonoran Corridor is a key element to the County's comprehensive plan, known as Pima Prospers and the Pima County Economic Development Plan. Both focus on promoting economic development with strategic transportation and other infrastructure investments in the area of the County-preferred alignment and supporting the growth of aerospace, defense and logistics industries in and around our regional and military airport facilities. In support of these goals, regional partners have already invested $12.5 million in the construction of the Aerospace Parkway, with another $10 million committed for an upgrade that is currently in design, with full completion anticipated by the spring of 2019. A major regional sewer line expansion and extension also has dedicated funds of $46 million and is currently under construction in the downtown area. The design for the area south of the airport is well underway, with construction starting in October 2017 and completion along Old Vail Connection to Wilmot projected by March 2018. While other alternatives could have localized benefits, such as the Town of Sahuarita's proposed southerly connection at El Toro Road, they do not fully capitalize on the investments noted above nor would they provide the same opportunities for regional job growth and economic development in the area near the airport, the San Xavier District and Desert Diamond Casino.

In conclusion, we believe there are significant benefits to further evaluating the County-preferred Sonoran Corridor route. We would be happy to discuss this alignment further and
request an in-person consultation between County staff and the Sonoran Corridor Project Team to address any questions and to provide additional information. Pima County also believes it is of critical importance to identify the necessary funding to conduct the Tier 2 study immediately following the Tier 1 evaluation so the project can advance for the greater benefit of the region.

Pima County’s Deputy County Administrator for Public Works, Carmine DeBonis Jr., will serve as the County’s point of contact for this project, and our Transportation Department can provide you with background information related to our preferred alignment. Mr. DeBonis may be contacted at 520.724.8474 or carmine.debonis@pima.gov.

Sincerely,

C.H. Huckelberry
County Administrator

CHH/mjk

c:  Carmine DeBonis, Jr., Deputy County Administrator for Public Works  
    Dr. John Moffatt, Director, Economic Development Office  
    Priscilla Cornelio, Director, Transportation Department  
    Jonathan Crowe, Principal Planner, Transportation Department
July 14, 2017

Sonoran Corridor Tier 1 Study Team  
C/O ADOT Communications  
1655 W. Jackson Street  
Mail Drop 128F  
Phoenix, AZ 85007

Dear Study Team:

Thank you for the opportunity to comment on the ADOT Sonoran Corridor Tier I Environmental Impact Statement (EIS). The Tucson Airport Authority (TAA) supports the proposed development of the Sonoran Corridor.

TAA's support for the Sonoran Corridor is based on the belief it has the potential to improve the movement of people and goods between Interstate 10 (I-10) and Interstate 19 (I-19), thereby reducing vehicle miles, engine emissions, and truck cargo's time to market. The TAA believes the Study Team should carefully evaluate a project corridor just south of the Tucson International Airport (TUS).

TUS is a major economic engine for Tucson and Pima County. Raytheon Missile Systems, Bombardier Aircraft Service Center, and the Arizona Air National Guard, 162nd Wing, to name a few, all operate from TUS. TUS has extensive airside development space available for cargo; maintenance, repair and overhaul; and aerospace operations. The Sonoran Corridor will help TUS’ existing firms as well as those who locate at the airport in the years to come.

Locating the Sonoran Corridor closer to TUS improves multimodal connectivity, improves passenger and cargo access to TUS, and increases the possibility of relieving congestion along Valencia Road. Locating the Sonoran Corridor closer to TUS will facilitate a connection from the south including Sahuarita, Green Valley and Nogales, again providing better access to TUS.

In addition to relieving congestion at I-19/I-10 and expediting transportation access to TUS, the Sonoran Corridor also has the ancillary benefit of spurring economic development along the corridor. The 2014 TUS Master Plan designated TAA's southern property for commercial/industrial use along Aerospace Parkway (Exhibit 1), which could also connect to the Sonoran Corridor. Such a connection will further promote Aerospace Parkway's attractiveness to companies considering expansion, relocation, or consolidation.

The Sonoran Corridor Study Team should avoid considering routes that will conflict with the TUS existing and proposed aeronautical development area as outlined in the TUS Airport Layout Plan (ALP) (Exhibit 2) as this will severely inhibit TAA's ability to meet future aviation demands and to increase the economic benefit to the community. My staff would be happy to meet with you to explain the TUS ALP and answer any questions you might have on TAA's future development plans for TUS.

Please do not hesitate to contact me if you have any questions or concerns regarding this correspondence. I can be reached by email at boallin@flytucson.com or by telephone at 520-573-8100.
Thank you for your interest and consideration.

Very truly yours,

Bonnie Allin, A.A.E.,
President/CEO

Enclosures (2)
1. Exhibit 1 – TUS Master Plan
2. Exhibit 2 – TUS Airport Layout Plan

cc: George W. Bootes III, Chief Economic Development Officer
    Mike Smajkal, Vice President of Planning and Engineering
    Scott Robidoux, Senior Airport Planner
Exhibit 1: TUS Master Plan
July 17, 2017

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

RE: FR Doc. 2017-09452 Sonoran Corridor Tier 1 Environmental Impact Statement; Scoping Comments

Thank you for providing the Arizona State Land Department ("ASLD" or the "Department") the opportunity to comment on the subject project. As the majority landowner in the project’s Study Area, ASLD views the Sonoran Corridor as a critical linkage for commerce and transportation in the Tucson metropolitan area. The Department has a fiduciary responsibility to manage State Trust lands to enhance value and optimize economic benefit for the Trust beneficiaries. Development of this high-capacity multi-modal corridor will provide a significant opportunity to maximize the value of nearby State Trust land through improving access, providing infrastructure, increasing the development potential of these lands and thereby allow ASLD to fulfill its trust mission.

ASLD fully supports the development of a high-capacity multi-modal corridor linking the I-10 & and I-19, and appreciates the value of this project to a wide number of stakeholders in the region. Greater access through the area will enhance the movement of freight and people and will enhance economic growth opportunities throughout the region. The Department looks forward to cooperating in the development of the Tier 1 Environmental Impact Statement ("EIS") as a Participating Agency, and appreciates the opportunity to partake in all discussions relating to the evaluation of potential corridor alternatives.

We look forward to working with the Federal Highway Administration, the Arizona Department of Transportation, and all other stakeholders in the development of the EIS. Please keep us apprised of all upcoming meetings and issues which may affect State Trust land as the study progresses. Should you have any questions or require any assistance, please do not hesitate to contact ASLD’s Project Manager, Micah Horowitz, at mhorowitz@azland.gov or at 602-542-2643, or Mark Edelman, ASLD Planning and Engineering Manager at medelman@azland.gov or 602-542-6331

Sincerely,

Wesley P. Mehl
Deputy Commissioner
July 11, 2017

John S. Halikowski  
State Engineer  
Arizona Department of Transportation  
206 S. 17th Ave.  
Mail Drop 100A  
Phoenix, AZ 85007

RE: Sonoran Corridor Environmental Assessment Study Area

Mr. Halikowski,

The Town of Sahuarita is a rapidly growing community in the Arizona Department of Transportation’s (ADOT) Southcentral District. Over the past several decades our region has extensively discussed and studied an East/West linkage from Interstate 19 (I-19) to Interstate 10 (I-10). In each of these efforts, a corridor connecting I-19 and I-10 has been identified as a critical need for the region. This corridor has been referred to as the Sonoran Corridor or State Route 410.

As you know, in February 2017 the Federal Highway Administration (FHWA) and ADOT initiated the environmental review process for the Sonoran Corridor. A Tier 1 Environmental Impact Statement (EIS) is being prepared as part of the National Environmental Policy Act (NEPA).

The Town of Sahuarita appreciates the opportunity to be involved as a participating agency in this current Sonoran Corridor effort, and would like to share our study and planning information as they may help in moving forward with this Tier 1 EIS effort.

Earlier studies evaluated potential corridors north, along, and south of Sahuarita Road. Those efforts included:

- Pima Association of Governments (PAG) Regional Transportation Plan (1986)
- Sahuarita Corridor Study (1990)
- Sahuarita Corridor Environmental Overview and Reassessment (2001)
- PAG 2025 Regional Transportation Plan Amendment (2004)

The result of the earlier studies culminated in an action by the Arizona Transportation Board to adopt one of the alternatives as a portion of the State Route plan for a future controlled access highway designated as State Route 982.

Subsequent to those efforts and development in the area, additional studies were completed:

- PAG State Transportation System Mobility and Regional Circulation Needs Feasibility Study (2006)
- PAG Southeast Area Arterial Study (2006)
The outcome of these efforts identified a loop candidate Sahuarita Corridor along El Toro Road, which would eventually link I-10 in northern Marana with I-10 near Vail. Those studies assumed a fully access controlled roadway with a 300-foot right-of-way to accommodate a 6- or 8- lane facility.

In more recent years, joint efforts by the Town of Sahuarita and the Arizona Department of Transportation have resulted in:

- Sahuarita Area Transportation Study (2010)
- Sahuarita El Toro Corridor Study (2013)

These studies evaluated a potential access-controlled facility between I-19 and I-10. Similar to previous studies, a fully-access controlled roadway with a 300-foot right-of-way to accommodate a 6- or 8-lane facility was assumed. The studies also evaluated existing conditions including land ownership, socioeconomic, environmental justice, environmental overview, transportation conditions, and other modes. These also looked at future conditions and needs. Following a series of public meetings and comment, the public supported the consideration of the El Toro and Pima Mine Road corridors for further study; however, consideration of a Pima Mine Road Corridor was discounted due to right-of-way constraints. In June 2015, Council adopted the Major Streets and Routes Plan Policy Manual providing a 300-foot corridor along a future El Toro.

Pima County has also been working to advance the Sonoran Corridor. Although our previous studies recommended two alternative alignments to connect I-19 to I-10 for further study: El Toro Road and Pima Mine Road, Pima County’s studies have started recommending the connection move north of Pima Mine Road due to right-of-way constraints and other factors. A potential alignment north of the Town of Sahuarita undermines the Town’s extensive planning and economic development objectives and further reduces tax revenues that could be realized from a southern connection. The Town of Sahuarita appreciates that ADOT has extended the Sonoran Corridor study area south to Drexel Road, which includes alternative alignments that could achieve the greatest relief for the existing interstate system and provide economic development opportunities for more of the region.

We are also aware that, as ADOT continues to study the transportation needs of the region, ADOT has embarked on a Corridor Profile Study of I-19 from Nogales to I-10. Among other things, the study highlights future mobility constraints between the Continental Road and San Xavier Road traffic interchanges. Additionally, the study identifies existing conditions and constraints due to the frequency of directional road closures. An alternate corridor alignment beginning as far south as El Toro would provide needed relief. A corridor connection further north diminished the benefit that could be realized by an auxiliary interstate.

The December 4, 2015, Fixing America’s Surface Transportation (FAST) Act declared the Sonoran Corridor a high priority corridor on the National Highway System, with this corridor connecting I-19 to I-10 south of the Tucson International Airport.

In June of 2015, the Town of Sahuarita adopted the General Plan “Aspire-2015”, which is a comprehensive, long-term guide to the Town’s future, and which includes the Sahuarita East Conceptual Area Plan.

In March of 2016, the Town of Sahuarita unanimously approved a motion to establish El Toro as a Key Commerce Corridor.
In May of 2017, the Council adopted a resolution in support of the Sonoran Corridor as an important interstate connection and regional economic catalyst, with El Toro as a Key commerce Corridor for Southern Arizona, Pima County, and the Town of Sahuarita. We are pleased to provide a copy of the official resolution prepared by the Town of Sahuarita in support of the Sonoran Corridor included with this letter.

In an effort to facilitate the Tier 1 EIS effort, we have also provided electronic files of our studies and plans to your Major Projects Group overseeing the current Sonoran Corridor Tier 1 EIS effort.

We look forward to working with the study team and other stakeholders as we move forward with the Sonoran Corridor process.

Sincerely,

Kelly Udall, Town Manager

Cc:
Dallas Hammit, ADOT State Engineer
Senator John McCain
Senator Jeff Flake
Representative Martha McSally
Representative Raul Grijalva
Rod Lane, ADOT Southcentral District Engineer
Carlos Lopez, ADOT Major Projects Group
Chuck Huckleberry, Pima County Administrator
Mike Ortega, Tucson City Manager
Farhad Moghimi, PAG Executive Director
Steve Hogan, WSP
Jan Gordley, Gordley Group
Alejandro Angel, Psomas
M.J. Dillard, Public Works Director/Town Engineer
Beth Abramovitz, Assistant Town Engineer

Attachment
SAHUARITA RESOLUTION NO. 2017-0502

A RESOLUTION OF THE TOWN OF SAHUARITA, ARIZONA, IN SUPPORT OF THE SONORAN CORRIDOR AS AN IMPORTANT INTERSTATE CONNECTION AND REGIONAL ECONOMIC CATALYST FOR SOUTHERN ARIZONA, PIMA COUNTY AND THE TOWN OF SAHUARITA.

WHEREAS, the Fixing America’s Surface Transportation Act, or FAST Act, designates the Sonoran Corridor as a high-priority corridor along planned State Route 410 in Pima County, connecting Interstate 19 and Interstate 10 south of Tucson International Airport; and

WHEREAS, the Sonoran Corridor will provide for traffic relief along I-19 and at the I-19 and I-10 interchange by creating an auxiliary interstate highway to connect I-19 and I-10 south of the Tucson International Airport; and

WHEREAS, the Arizona Department of Transportation and the Federal Highway Administration have undertaken a Tier 1 Environmental Impact Statement study for the Sonoran Corridor; and

WHEREAS, the Town of Sahuarita has planned for surface transportation corridors, through the adopted Major Streets and Routes plan, and has identified El Toro Rd. as a key commerce corridor and the preferred southern-most link in the Sonoran Corridor to maximize the goals of the auxiliary interstate highway; and

WHEREAS, an auxiliary interstate highway connection between Interstate 19 and Interstate 10 would be significantly beneficial to facilitate trade with Mexico, particularly trucking that desires an eastern terminus beyond Arizona’s border, and as a high-speed surface transportation facility within the metropolitan area; and

WHEREAS, the Sonoran Corridor will also be an economic development initiative for Pima County and Southern Arizona, and once completed will significantly transform the regional economy; and

WHEREAS, an auxiliary interstate highway connection between Interstate 19 and Interstate 10 will support the Sahuarita East Conceptual Area Plan and General Plan Aspire 2035 vision for current and future primary employment and residential centers; and

WHEREAS, an auxiliary interstate highway will link Sahuarita’s resident labor force to major employment centers within the metropolitan area and the Tucson International Airport, Raytheon, the University of Arizona Tech Park, the Port of Tucson the Aerospace Research Campus and the Pima County Southeast Employment and Logistics Center; and
WHEREAS, the Mayor and Council of the Town of Sahuarita are strongly committed to supporting the ongoing planning by the Federal Highway Administration and the Arizona Department of Transportation and engaging in regional dialogue with the Pima Association of Governments, Pima County and local partners for the advancement of an auxiliary interstate highway and the Sonoran Corridor.

NOW, THEREFORE, BE IT RESOLVED that the Mayor and Council of the Town of Sahuarita, Arizona, supports an auxiliary interstate highway and the Sonoran Corridor connecting Interstate 19 and Interstate 10 for the diversification and expansion of economic development in Pima County and the Town of Sahuarita.

PASSED AND ADOPTED by the Mayor and Council of the Town of Sahuarita, Arizona, this 22nd day of May, 2017.

Mayor Tom Murphy

APPROVED:

Daniel J. Hochuli
Town Attorney

ATTEST:

Lisa Cole, MMC
Town Clerk
December 19, 2017

Tremaine Wilson, Environmental Coordinator
Federal Highway Administration
4000 North Central Avenue, Suite 1500
Phoenix, Arizona 85012-3500
Tremain.wilson@dot.gov

Re: 410-A (BFI)
TRACS No. P10005P
Sonoran Corridor Tier 1 EIS
Draft Scoping Summary Report for Agency Review

Dear Mr. Wilson,

Thank you for the opportunity to comment on the Draft Scoping Summary Report for Agency Review and for capturing the comments we made during the scoping process. We do not have any further comments at this time. We look forward to working with you on this process.

Sincerely,

Michael J. Ortega, P.E.
City Manager

Cc: Albert Elias, Assistant City Manager, Tucson Arizona
Daryl W. Cole, Department of Transportation Director, City of Tucson
Robin Raine, Deputy Director, Department of Transportation, City of Tucson
Carlo Lopez, ADOT Project Manager CLopez@azdot.gov
Shellie Ginn, Planning Administrator, Department of Transportation, City of Tucson
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<tr>
<td>National Park Service</td>
<td>Dear Sir/Madam, Using the link(s) below, you can download NPS comments on ER-17/0239, the Sonoran Corridor between Interstate 10 and Interstate 19, Tier 1. If you have questions, please contact David Hurd at <a href="mailto:imvextrev@nps.gov">imvextrev@nps.gov</a>. ER.17.0239 Sonoran Corridor between Interstate 10 and Interstate 19, Tier 1.pdf: <a href="https://irma.nps.gov/ERTS/Download/2b79364a4f4d725770375a517279785f4d5144614b398616d794654d517952625374d630677354516b7a745462306f66b5562375a58456c4a787a3466">https://irma.nps.gov/ERTS/Download/2b79364a4f4d725770375a517279785f4d5144614b398616d794654d517952625374d630677354516b7a745462306f66b5562375a58456c4a787a3466</a></td>
<td>Thursday, July 13, 2017 2:31 PM</td>
<td>Email</td>
<td>Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td>July 14, 2017 at 2:28:33 PM MST Kimberly Noetzel</td>
</tr>
<tr>
<td>Nichole Olsker Bureau of Reclamation</td>
<td>To whom it may concern, Attached is the Bureau of Reclamation's comments to the Sonoran Corridor Tier 1 EIS. U.S. Bureau of Reclamation Phoenix Area Office 6150 West Thunderbird Road Glendale, AZ 85306</td>
<td>Friday, July 14, 2017 4:51 PM</td>
<td>Email</td>
<td>Dear Ms. Olsker, Thank you for providing your input on the proposed Sonoran Corridor on behalf of the Bureau of Reclamation. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td>July 17, 2017 at 10:11:30 AM MST Kimberly Noetzel</td>
</tr>
</tbody>
</table>
### Summary

The vertical column on the left describes the forum in which comments were submitted. The columns along the top describe questions asked of participants on the comment forms. The rankings are based on the average score given each topic in each forum and cumulatively.

<table>
<thead>
<tr>
<th>Traffic congestion and delays</th>
<th>Lack of connectivity between highways and form high/low local streets</th>
<th>The absence of alternative forms of transportation from what exists today (e.g., bicycle routes, passenger rail, etc.)</th>
<th>Neighborhoods, diverse communities, and residences</th>
<th>Economic development and growth</th>
<th>Preserving existing land use</th>
<th>Preserving public parks and recreation sites</th>
<th>Cultural sites</th>
<th>Historic sites</th>
<th>Archeologic al sites</th>
<th>Other issue(s) not addressed above</th>
<th>Air quality</th>
<th>Biological resources (such as wildlife, plants, and habitat)</th>
<th>Geology, soils, and farmland</th>
<th>Historic structures and archeologic al sites</th>
<th>Noise and vibration</th>
<th>Visual and aesthetics</th>
<th>Water resources (rivers, washes, floodplains and drainage)</th>
<th>Other issue(s) not addressed above</th>
<th>Preference for Pima Mine Rd to Rita Rd; concerns about poor road maintenance and truck traffic.</th>
<th>Preference for connection to I-10; encouragement to minimize all potential impacts.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tucson</td>
<td>1.7</td>
<td>2.3</td>
<td>2.3</td>
<td>4.7</td>
<td>3</td>
<td>3.3</td>
<td>5.7</td>
<td>4</td>
<td>1.1</td>
<td>2.7</td>
<td>9</td>
<td>2.5</td>
<td>15</td>
<td>4.3</td>
<td>3.4</td>
<td>1.8</td>
<td>4.1</td>
<td>2.2</td>
<td>8</td>
<td>Avoid interfering with existing and planned communities and neighborhoods.</td>
</tr>
<tr>
<td>Sahuarita</td>
<td>1.8</td>
<td>4</td>
<td>3.3</td>
<td>4.4</td>
<td>2</td>
<td>2.6</td>
<td>4.3</td>
<td>4.4</td>
<td>5</td>
<td>4.6</td>
<td>5.3</td>
<td>3.9</td>
<td>2.9</td>
<td>6.3</td>
<td>1.1</td>
<td>4.1</td>
<td>4.3</td>
<td>4.3</td>
<td>8</td>
<td>Avoid interfering with existing and planned communities and neighborhoods.</td>
</tr>
<tr>
<td>Other</td>
<td>1.6</td>
<td>3.1</td>
<td>2.6</td>
<td>3.8</td>
<td>3.4</td>
<td>2.9</td>
<td>2.9</td>
<td>5.2</td>
<td>4</td>
<td>4.5</td>
<td>4</td>
<td>4.2</td>
<td>4.9</td>
<td>2.9</td>
<td>1.1</td>
<td>5.3</td>
<td>3.4</td>
<td>4</td>
<td>4.5</td>
<td>1.1</td>
</tr>
</tbody>
</table>

**Subject of most concern:**

**Subject of least concern:**

The study team will evaluate and consider potential impacts on many human environmental factors. Please rank the following in order of importance to you:

<table>
<thead>
<tr>
<th>Rank each of the following items on a scale of 1 to 5, with 1 being MOST important and 5 being LEAST important</th>
<th>Rank each of the following items on a scale of 1 to 8, with 1 being MOST important and 8 being LEAST important</th>
<th>Rank each of the following items on a scale of 1 to 8, with 1 being MOST important and 8 being LEAST important</th>
<th>Identify the areas or resources within the Sonoran Corridor Study vicinity that you feel should be avoided or are important for the study team to consider:</th>
<th>Additional Comments:</th>
</tr>
</thead>
</table>

Please tell us the challenges you experience today, or anticipate in the future, when traveling in the vicinity of Interstate 10 and Interstate 19 south of the Tucson International Airport:
The vertical columns represent individual comment forms provided by participants. The topics across the top of the chart reflect questions asked on the comment form and the number in each intersecting box represents the ranking given each topic by the individual commenter. Blank boxes indicate no response in comment form.

**Comment Form #1**
1. Why have over three year planning period before anything even gets started. Set six month deadline for each phase.
2. Low speeds blocking traffic.
3. No maintenance on existing roads.
4. Waterproofed road beds, needing too long before chip sealing is done.
5. Cost is a big factor to look at
6. Cultural implications
7. I vote for Pima Mine road to Rita road.
8. Stay away from existing housing developments.

**Comment Form #2**
1. Air quality
2. Economic growth potential
4. Why have over a three year planning period before anything even gets started. Set six month deadline for each phase.

**Comment Form #3**
1. I would like to see it go from Pima Mine road to Rita road.
2. With the growth in the area, compete before communities are filled in.
3. I would like to see it go from Pima Mine road to Rita road.

**Comment Form #4**
1. Increased truck traffic from Mexico ports.
2. Cost is a big factor to look at
3. Why have over a three year planning period before anything even gets started. Set six month deadline for each phase.
4. Cultural implications
5. My choice.
6. Why have over three year planning period before anything even gets started. Set six month deadline for each phase.

**Comment Form #5**
1. Cost is a big factor to look at
2. Cultural implications
4. Why have over three year planning period before anything even gets started. Set six month deadline for each phase.
5. I would like to see it go from Pima Mine road to Rita road.

**Comment Form #6**
1. Air quality
2. Economic growth potential
4. Why have over a three year planning period before anything even gets started. Set six month deadline for each phase.

**Comment Form #7**
1. I would like to see it go from Pima Mine road to Rita road.
2. With the growth in the area, compete before communities are filled in.
3. I would like to see it go from Pima Mine road to Rita road.

**Comment Form #8**
1. Air quality
2. Economic growth potential
4. Why have over three year planning period before anything even gets started. Set six month deadline for each phase.

**Comment Form #9**
1. I would like to see it go from Pima Mine road to Rita road.
2. With the growth in the area, compete before communities are filled in.

**Comment Form #10**
1. I would like to see it go from Pima Mine road to Rita road.
2. With the growth in the area, compete before communities are filled in.

**Average Scores**
1.5 2.3 2.3 4.7 3 3.3 2.1 5.7 4 3.9 3.1 2.7 6 2.5 3.5 4.3 3.4 3.8 4.1 2.2 8
Rank each of the following items on a scale of 1 to 5, with 1 being MOST important and 5 being LEAST important:

<table>
<thead>
<tr>
<th>Comment #1</th>
<th>Comment #2</th>
<th>Comment #3</th>
<th>Comment #4</th>
<th>Comment #5</th>
<th>Comment #6</th>
<th>Comment #7</th>
<th>Comment #8</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>6</td>
<td>7</td>
<td>8</td>
</tr>
</tbody>
</table>

- Traffic congestion & delays
- Lack of connectivity between highways & heavy commercial traffic
- The presence of alternative transportation forms (e.g. bicycle, pedestrian, public transit)
- Economic development & land use
- Historical & architectural sites
- Natural landscapes
- Other issues not addressed above

The study team will also consider and evaluate the potential impacts on many natural environmental factors. Please rank each of the following in order of importance to you:

<table>
<thead>
<tr>
<th>Biological resources (such as wildlife, plants, habitat)</th>
<th>Geology, soils, and landforms</th>
<th>Historic structures and architectural sites</th>
<th>Noise &amp; vibration</th>
<th>Visual aesthetics</th>
<th>Water resources (rivers, lakes, wetlands)</th>
<th>Other issue(s) not addressed above</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>6</td>
<td>7</td>
</tr>
</tbody>
</table>

Please rank the following in order of importance to you:

1. Moving the last few miles to El Toro Road.
2. Move it to Pima Mine Road.
3. Make it to I-10 south of Tucson International Airport.
4. Other ways to get north & south besides the highways & not and won’t let here:
5. Make a decision & get it done. A little less conversation & a little more action.
6. Important to have least impact on previously undeveloped area & established historical communities.
7. Great possible impact on the San Xavier community & generally least impact on previously undeveloped land.
8. Other issue(s) not addressed above.
Rank each of the following items on a scale of 1 to 10, with 1 being MOST important and 8 being LEAST important.
The study will evaluate and consider potential impacts on many human environmental factors.
Please rank the following in order of importance to you.

<table>
<thead>
<tr>
<th>Comment Form(s)</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tucson + Sahuarita</td>
<td>7</td>
<td>7</td>
<td>8</td>
<td>8</td>
<td>7</td>
<td>8</td>
<td>8</td>
<td>7</td>
<td>8</td>
<td>8</td>
<td>7.8</td>
</tr>
<tr>
<td>Other</td>
<td>5</td>
<td>6</td>
<td>7</td>
<td>8</td>
<td>5</td>
<td>6</td>
<td>7</td>
<td>5</td>
<td>6</td>
<td>6</td>
<td>6.1</td>
</tr>
</tbody>
</table>

### Additional Comments:

- I hope that this proposed project will not build near existing neighborhoods.
- Important to preserve the area near the Mission important.
- Important to have enough space to take I-11 would be important to take into account how this corridor will impact the people who live in the area.
- Avoid Green Valley pecan grove; connect to I-10 near AZ.
- The proposed I-11 split off from the existing I-10 of Indian or to avoid bringing the new interstate directly through the order of Tucson Valley, I-11 planner through direct route, today, will destroy the quality of life for Owens Valley.
- Tree and shade along the right-of-way.
- Water resources, watersheds, floodplains, and drainage.
- Noise and vibration.
- Visual and aesthetics.
- Water resources, watersheds, floodplains, and drainage.
- Noise.

### Other Forms:

- Sonoran Corridor Scoping Comments
- Study vicinity that you feel should be avoided or are important for the study team to consider:

#### Important:

- Please tell us the challenges you experience today, or anticipate in the future, when traveling in the vicinity of I-10 and Interstate 11.
- The absence of alternative forms of transportation that exist to or from what exists in the vicinity of I-10.
- Transportation network.

#### Neighbors:

- Is the area a right of way?
- I-10 to the left, I-11 to the right.

#### Other Issues:

- Lack of connectivity between highways.
- Sharing highways with heavy commercial traffic.
- Traffic congestion and delays.
Social Pinpoint is an on-line public involvement tool that allows participants to place a virtual "pin" on a designated area map and provide comments or questions to the study team that helps foster better understanding of opportunities or concerns specific to the project.

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Comment</th>
<th>Additional Comment</th>
<th>Topic</th>
<th>Comment &quot;Likes&quot;</th>
<th>Comment &quot;Dislikes&quot;</th>
<th>Address</th>
<th>Suburb</th>
<th>Postcode</th>
<th>Email</th>
<th>Created on</th>
</tr>
</thead>
<tbody>
<tr>
<td>Randy</td>
<td>Gage</td>
<td>Leave green valley on the south side and go straight up to where they want to put the Rosemont mine. Studies have already been done in that area. It would also eliminate an unwanted Mine and since you will cut the corridor for animals anywhere you put it make the best out of it for the people that live here.</td>
<td>The Rosemont Mine is UNWANTED. Leave I-19 south of Green Valley and meander toward that site, and directly through it.</td>
<td>Build It</td>
<td>0</td>
<td>0</td>
<td>85629</td>
<td><a href="mailto:Randygage24@gmail.com">Randygage24@gmail.com</a></td>
<td>2017-06-15 12:49:09 +1000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I am in favor of the connection to I-19 occurring at El Toro Road. The proposed casino interchange will be costly and will require significant work with allotted land. The El Toro interchange would be further south, thus getting the traffic off I-19 earlier, which further serves the goal. Finally, land cost will be greatly reduced, as that alignment is essentially vacant desert.</td>
<td>Build It</td>
<td>3</td>
<td>2</td>
<td>85737</td>
<td><a href="mailto:linuslarabee@hotmail.com">linuslarabee@hotmail.com</a></td>
<td>2017-06-14 06:48:49 +1000</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Sahuarita road looks like the best path for bypass | Build It | 3 | 4 | 85645 | peteramurner@gmail.com | 2017-06-11 13:11:57 +1000 |
| We live south of Vail for a reason; peace, quite, wide open spaces, and rural environment. This project threatens those aspects for all the home owners of the area. With the extreme addition of the vehicular traffic and possible build up, brings the increased probability of crime; something no parent or person would welcome close to their home. | Environmental Concerns | 0 | 0 | 85641 | immsj0863@gmail.com | 2017-06-23 05:24:33 +1000 |
| Noise mitigation barriers will be mandatory on both sides of I19 throughout it's transit through Green Valley. GV will still be negatively impacted regardless. Who pays for the third phase connection of I29 & I10? A 32 billion dollar economic impact PER YEAR to the area would seem a gross exaggeration of the most optimistic variety. Additionally, any connecting road between I10 & I19 should be kept well away from any land owned by real estate developers who would stand to benefit from the connection. This would be the minimum moral requirement going forward. | Environmental Concerns | 2 | 1 | 85601 | dgwriter@juno.com | 2017-06-09 11:41:14 +1000 |
| Stop tearing up the desert. We do not need this "improvement". It will only aid the more rapid and effective distribution of contraband and undocumented peoples. I suspect also that a major undeclared purpose of this scheme is for the people involved to keep on getting a paycheck and grow their numbers. I predict that within two years the US/Mexico border will be closed anyway due to social/economic reasons and tightly regulated. Are you really unaware of the global bond market issues? An imploding bond market will bring a halt to schemes like this. You are wasting money and time. What I think is coming will see a huge increase in US military presence in southern Arizona not more transfer trucks. Bulldozing the city of South Tucson for the construction of a vast FEMA camp would be a better use of the time and money. | Environmental Concerns, Don't Build It | 2 | 8 | 85648 | 304roberto123@gmail.com | 2017-06-06 20:48:53 +1000 |
| Gary     | Corbett   | A I-19 turn-off here to I-10 seems to "thread the needle" between already built-up areas of Sahuarita and Summit... while keeping north of the Santa Rita Foothills. Saving construction costs and eminent domain payouts is always important. Keep the cost down | Keep the cost down | 2 | 0 | 85745 | corbettg@yahoo.com | 2017-06-14 10:21:29 +1000 |
| Matthew  | Jackson   | I-10 also needs to be 3 or more lanes because the current two lane system is not working. | Travel Efficiency | 3 | 1 | 85629 | mj.j2005@yahoo.com | 2017-06-14 18:17:08 +1000 |
Welcome/Bienvenido

Welcome

(Para Español, use el mouse para avanzar al final de esta página)

In partnership with the Federal Highway Administration (FHWA), the Arizona Department of Transportation (ADOT) has begun a three-year environmental study to select a location for the Sonoran Corridor, a proposed new transportation facility that would connect Interstate 10 (I-10) and Interstate 19 (I-19) south of the Tucson International Airport.

HOW TO PARTICIPATE:

1. START—Zoom in on an area of the map that’s important to you.
2. Using your mouse, GRAB a pin from the top.
3. DRAG and DROP the pin on the area of the map where you would like to leave a comment.
4. Once you “drop” the pin, a screen will popup so you can TELL US more.
5. Complete the survey! You can access the survey on the sidebar to the left by clicking the “Take the Survey” icon or by clicking on the yellow information marker located on the map.

WANT TO DO MORE?

1. Read other people’s comments. Click on the “ACTIVITY” feed on the left side of your screen.
2. Add a photo!
July 10, 2017

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

Re: Comments on the Sonoran Corridor Tier 1 Study Area

Ladies and Gentlemen:

ASARCO LLC, a Delaware limited liability company ("ASARCO"), is a fully integrated mining, smelting, and refining company based in Tucson, Arizona. At its Mission Complex, ASARCO mines and processes copper ore to supply the increasing needs of the American population for copper products. It should be noted that a majority of the copper produced by ASARCO remains in the United States with a small portion being provided to other North American countries. The Mission Complex is located at 4201 West Pima Mine Road, Sahuarita, Arizona, approximately 18 miles south of Tucson, in Pima County, Arizona.

The primary access to the Mission Complex is west three miles off of I-19 on Pima Mine Road with an emergency access from both Helmet Peak Road and Mission Road. The Mission Complex operates twenty-four (24) hours per day, seven (7) days per week, and employs over 600 individuals, paying wages, salaries and benefits of $45 million in 2016. ASARCO owns over 19,000 acres of real property in and around the Mission Complex, on both sides of I-19 and Tucson-Nogales Highway along Pima Mine Road.

ASARCO’s Land Position

ASARCO’s real property ownership includes the following multiple purpose land uses away from the Mission Complex:

1. Agricultural lands utilized by a cattle operation east and west side of Tucson-Nogales Highway at Pima Mine Road in Sections 7, 18,19, 20, 29, and 30, Township 16 South, Range 14 East.
2. An aggregate mining operation producing sand and gravel west side of Tucson-Nogales Highway at Pima Mine Road in Sections 29 and 30, Township 16 South, Range 14 East (a Resource Extraction Area).

3. Southern Pacific Railroad has railroad tracks on ASARCO’s land and a railroad spur that parallels Pima Mine Road connecting the Mission Complex to the railroads main line at Tucson-Nogales Highway. This spur is used to move supplies to the Mission Complex and to transport copper concentrate to ASARCO’s Hayden Smelter, one of the three remaining active copper smelters in the United States.

4. The City of Tucson and Central Arizona Water Conservation District (“CAWCD”) operate a CAP recharge facility in Sections 19 and 30, Township 16 South, Range 14 East, which has recharged into the aquifer an estimated 266,431 acre-feet of water at this facility up through December 31, 2015, for the future needs of Pima County, Arizona. In addition, the terminus of the CAWCD delivery system to various CAP subcontractors in southern Pima County is also located along Pima Mine Road, west of I-19 on ASARCO property which facilitates the connection to this recharge facility.

5. Two (2) solar facilities are operated on 345 acres of land located in Sections 17, 18, and 19, Township 16 South, Range 14 East, providing 58 MW of renewable energy through Tucson Electric Power as well as 148 acres of land restricted for development by Pima County to preserve native plants and cultural resources.

6. ASARCO has grandfathered groundwater rights and water pipelines located throughout its property which provides a necessary long-term source of water for ASARCO which is necessary to operate its mining facilities and produce copper in conjunction with other wells located on the Tohono O’odham Nation which are utilized to process ore from lands within the Nation.

Comments on Tier 1 Study

ASARCO found several inaccuracies in the Sonoran Corridor Study Vicinity Map for the Tier 1 Study. We believe these inaccuracies stem from using the Pima County 2015 Comprehensive Plan Land Use Map, which mischaracterizes ASARCO’s land uses. All of the real property shown in “gray” west of I-19 between Pima Mine Road and Sahuarita Road is owned by ASARCO and is a part of its Mission Complex. Therefore, this property should properly be identified as part of its “Resource Extraction Area.” The remainder of ASARCO’s real property located north of Pima Mine Road and east of I-19 is identified as “Planned Development Community” and is a mischaracterization of ASARCO’s current and future planned uses for this land. As previously indicated, these lands are already developed and are
utilized for multiple commercial purposes which include solar facilities, a groundwater recharge facility, aggregate mining and agricultural operations as well as providing an ongoing supply of groundwater vital for mining operations at the Mission Complex. Further, the Vicinity Map does not identify the 400 feet wide strip of fee land owned by ASARCO south of Pima Mine Road between Interstate 19 and Tucson-Nogales Highway which provides railroad, water and utility services to the Mission Complex for its operations.

The developments on ASARCO’s property provide much needed copper products, renewable energy resources, and groundwater supplies to meet and sustain the future needs of the local, state and national population. The inclusion of a major transportation corridor within ASARCO’s land could negatively impact its ability to continue to provide these resources. We would ask that any transportation corridor avoid our property east of I-19 and suggest that the evaluation of a transportation corridor to the south of Sahuarita, Arizona would be more beneficial to meet the transportation challenges in the area.

We appreciate the opportunity to participate in the Sonoran Corridor Tier 1 Study being conducted to determine the location of the Sonoran Corridor connecting I-10 to I-19 and look forward to participating in the process associated with constructing this transportation corridor.

Sincerely,

Robin E. Barnes
Corporate Land Manager
July 14, 2017

Sonoran Corridor Tier 1 EIS Study Team
C/O ADOT Communications
1655 W. Jackson Street
Mail Drop 126F
Phoenix, AZ 85007

Submitted via email: sonorancorridor@azdot.gov

The Fresh Produce Association of the Americas (FPAA) appreciates the opportunity to participate in the comment process for the Tier 1 EIS Study for the Sonora Corridor. The FPAA would also like to be included in future notices regarding updates of this study process as our members are stakeholders that will be impacted directly by the future Sonoran Corridor.

As ADOT studies the corridor alternatives, the FPAA urges the team to keep in mind the importance of such a route in facilitating the movement of commercial trucks to and from Nogales, Arizona, the location of the state’s largest port of entry with Mexico. The Mariposa Port of Entry in Nogales, Arizona is the main gateway of trade between Arizona and Mexico. During the peak of the season, over 1,600 trucks cross the border. In fact, in May the Mariposa Port of Entry saw its largest day in commercial crossings when 1,900 trucks crossed the border.

Many of these Mexican trucks are loaded with fresh fruits and vegetables that are offloaded in warehouses in Nogales and Rio Rico. From there, U.S. trucks drive to Nogales to load the fresh produce and drive it to markets across the U.S. and Canada. It is estimated that for every single load of produce crossing from Mexico to an area warehouse, it takes up to three U.S. trucks to move that shipment from area warehouses to buyers across the U.S. Many trucks arriving from Mexico are carrying full loads of a single commodity. However, many buyers in the U.S. are only buying a few pallets of a single commodity, not a full load. This is why you see a proportional increase in U.S. trucks to distribute the goods that cross the border to area warehouses. That means if 1,000 Mexican trucks cross the border, then approximately 3,000 trucks from the U.S. travel from 1-10 to 1-19 south to Nogales to load the goods to return north.
While not located directly in the study area for proposed routes, the FPAA’s members are heavy users of I-19 and I-10 in moving commercial shipments of fresh produce imported through Nogales, Arizona and distributed across the United States and Canada. Having adequate road infrastructure is an important competitive advantage when working with buyers to bring goods to market. It is also important in encouraging new businesses to relocate to the area.

FPAA members are extremely interested in facilitating the movement of commercial goods to market by creating an alternative road that would avoid the congestion of the I-19/I-10 connection. This would help trucks traveling both to Nogales to pick up produce and traveling from Nogales to buyers across the U.S. Any logistical and time-saving advantages bring direct positive impacts to the movement of fresh, perishable agricultural goods.

The Sonoran Corridor would also create better redundancy in connectivity in the event of major traffic issues that could impact either route. This is important for area businesses so they have adequate access to transportation routes leading to major markets. It is also important for food security in the U.S. Any major closures or issues that could impact the existing route, without a Sonoran Corridor alternative, would impact the delivery of goods to market, thereby impacting the availability of fresh produce in grocery stores and food service channels.

Please do not hesitate to contact me if we can provide any additional information or feedback that would assist ADOT as you go through the study process. We look forward to being engaged in this process moving forward.

Sincerely,

Lance Jungmeyer
President
Fresh Produce Association of the Americas
<table>
<thead>
<tr>
<th>From</th>
<th>Agency</th>
<th>Comment</th>
<th>Topic</th>
<th>Address</th>
<th>Date Received</th>
<th>Medium</th>
<th>Response</th>
<th>Date Responded</th>
<th>Responder</th>
</tr>
</thead>
<tbody>
<tr>
<td>Frank Kalusa</td>
<td>My opinion on the Sonoran Corridor:</td>
<td>Since this road is meant to bypass the Tucson area and provide a more direct path from I-19 to I-10, it makes sense to build it as far south as possible. My feeling is to use the existing El Toro exit off I-19 and head east to connect to I-10. The path would parallel Sahuarita Road, and there is plenty of empty space north of the Sahuarita Highlands subdivision.</td>
<td>Build It</td>
<td>Tuesday, May 30, 2017 10:56 AM</td>
<td>email</td>
<td>Dear Mr. Kalusa, Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td>June 2, 2017 at 4:21:26 PM MST</td>
<td>Kimberly Noetzel</td>
<td></td>
</tr>
<tr>
<td>Joshua Hall</td>
<td>Hi, My name is Joshua Hall. I am a truck driver for Swift so I can’t make it to the meetings for the Sonoran Corridor project. But my family is in Tucson, my wife and I are strong supporters of the proposed corridor. We believe that for Tucson to evolve and grow. This is an absolutely a need for the Southwest side of Tucson. Especially with me being a truck driver it will cut down from me driving through the I-9 or taking Houghton down to Sahuarita as a alternate to get to Nogales for доставляя. Please if you have any questions or need of anything to help move this project forward. You can contact me via this email: <a href="mailto:Joshuahall52@yahoo.com">Joshuahall52@yahoo.com</a> or call 520-507-0563</td>
<td>Build It</td>
<td>Thursday, June 08, 2017 9:47 AM</td>
<td>Email</td>
<td>Dear Mr. Hall, Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td>June 12, 2017 at 2:39:29 PM MST</td>
<td>Kimberly Noetzel</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manny Bracamonte Jr</td>
<td>Fathom Realty</td>
<td>Tucson is growing rapidly, and the Sonoran Corridor freeway is something we desperately need despite the opposition. In my view, it needs to be a much bigger project and not only go between I-15 and I-10, it should also extend east to to Kolb/I-10 interchange, and it should also extend west of the airport to alleviate traffic on Valencia road.</td>
<td>Build It</td>
<td>Wednesday, June 07, 2017 11:21 AM</td>
<td>Email</td>
<td>Dear Mr. Bracamonte, Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td>June 12, 2017 at 2:38:29 PM MST</td>
<td>Kimberly Noetzel</td>
<td></td>
</tr>
<tr>
<td>Robin Livingston</td>
<td>Yes build it: If you want to alleviate I-10 traffic on the eastern side of the metro area and provide better road access for the growing communities of the Santa Rita foothills, please route the corridor more closely with Sahuarita Road.</td>
<td>Build It</td>
<td>Tuesday, May 30, 2017 1:21 AM</td>
<td>Email</td>
<td>Dear Robin, Thank you for your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td>June 2, 2017 at 4:25:37 PM MST</td>
<td>Kimberly Noetzel</td>
<td></td>
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<tr>
<td>Scott Aitherr</td>
<td>Thank you for the opportunity to comment on this study. It's in the context of providing a highway connection from I-10 to I-15. I don’t have a lot of input. It’s not on my radar for my personal transportation needs; however, I do believe it can serve as multi-purpose corridor for utilities. Please plan now and include major utilities as a component of the corridor size and alignment. I would hope that the corridor can accommodate and preserve an easement for future Central Arizona Project main extension to the eastern communities that have an allocation and presently don’t have a means to obtain it. I'm not talking about the line being constructed with the project, but allocating a designated corridor for that extension would be beneficial to the region at large.</td>
<td>Build It</td>
<td>Tuesday, May 30, 2017 10:50 AM</td>
<td>Email</td>
<td>Dear Mr. Aitherr, Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td>June 2, 2017 at 4:24:30 PM MST</td>
<td>Kimberly Noetzel</td>
<td></td>
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<tr>
<td>Charles Broder</td>
<td>This project should be laid to rest. There is insufficient need for a connector highway. The environmental and social damage will not be worth the cost and frankly the monetary cost should be better utilized by maintaining and upgrading existing roads. Please do not build this connector simply because you can and because it will expand your budget.</td>
<td>Don’t Build It</td>
<td>Tuesday, May 30, 2017 8:13 PM</td>
<td>Email</td>
<td>Dear Mr. Broder, Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td>June 2, 2017 at 4:31:12 PM MST</td>
<td>Kimberly Noetzel</td>
<td></td>
<td></td>
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<tr>
<td>Ann S English</td>
<td>Coconino County Board of Supervisors</td>
<td>Why not look at connecting Sonora with Arizona near Douglas Arizona. Study 80 and 193 to see how we could get commercial traffic from the port to rail and I-10 in Wilcox. Why put all the emphasis on Nogales when there is a lot of cross border traffic from the big mines near Cananea. This would not be as costly and it would provide another viable route from Sonora. Why not study this area also. I think it would provide a lot of economic development for an area with space and need. We know how important it is to have good transportation plans to get commercial interest. There are many expanding maquiladora industries in Agra Prieta serving American companies. Thank you for your consideration.</td>
<td>Economic Development</td>
<td>Tuesday, May 23, 2017 4:59 PM</td>
<td>Email</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Name</td>
<td>Company/Association</td>
<td>Email Address</td>
<td>Date</td>
<td>Time</td>
<td>Subject: Proposed Sonoran Corridor: What do you think?</td>
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<tr>
<td>John Gleason</td>
<td></td>
<td><a href="mailto:kgleason@azcentral.com">kgleason@azcentral.com</a></td>
<td>June 7, 2017</td>
<td>5:20 PM</td>
<td>Dear Mr. Gleason, As the saying goes, the third time is the charm, right? We have the most recent comment and will include it in the project record.</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>John Gleason</td>
<td></td>
<td><a href="mailto:kgleason@azcentral.com">kgleason@azcentral.com</a></td>
<td>June 12, 2017</td>
<td>2:41:39 PM MST</td>
<td>Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>John Gleason</td>
<td></td>
<td><a href="mailto:kgleason@azcentral.com">kgleason@azcentral.com</a></td>
<td>June 14, 2017</td>
<td>5:20 PM</td>
<td>Thank you for the opportunity to comment. I would hope the project continues forward to completion of a new road.</td>
<td></td>
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<tr>
<td>John Gleason</td>
<td></td>
<td><a href="mailto:kgleason@azcentral.com">kgleason@azcentral.com</a></td>
<td>June 16, 2017</td>
<td>1:45:16 PM MST</td>
<td>Thank you for the opportunity to comment. I would hope the project continues forward to completion of a new road.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maran</td>
<td>Green Valley AZ Homeowners Association</td>
<td><a href="mailto:maran@azcentral.com">maran@azcentral.com</a></td>
<td>June 7, 2017</td>
<td>2:14:15 PM MST</td>
<td>Dear Mr. Butler, Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

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**Subject:** Proposed Sonoran Corridor: What do you think?

**Email Address:** kgleason@azcentral.com

**Date:** June 7, 2017

**Time:** 5:20 PM

**To:** John Gleason

**Subject:** Proposed Sonoran Corridor: What do you think?

Dear Mr. Gleason,

As the saying goes, the third time is the charm, right? We have the most recent comment and will include it in the project record.

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

June 7, 2017 at 2:14:15 PM MST

Kimberly Noetzel

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**Subject:** Proposed Sonoran Corridor: What do you think?

**Email Address:** maran@azcentral.com

**Date:** June 7, 2017

**Time:** 2:14:15 PM MST

**To:** Maran

**Subject:** Proposed Sonoran Corridor: What do you think?

Dear Mr. Butler,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

June 7, 2017 at 2:14:15 PM MST

Kimberly Noetzel
Dear ADOT,

Kimberly Noetzel
Susanna Schippers
Miskell
Sammartino
Association
Homeowners
Green
Valley
AZ

lighting for the roadway. Finally, given the presence of telescopes in the area please minimize the amount and intensity of lighting for the roadway.

Also, please consider using lighter-colored asphalt to minimize the heat island and global warming effects of this new roadway. The study area includes desert land that is not likely to be developed on the Tohono O’odham Nation, and it is important to maintain connectivity between that land and land to the south for animals migrating through the area. Also consider re-surfacing the footpath of the roadway (keep it as narrow as possible) so that birds (and bats and insects) can more easily fly across. I know trees would probably not be allowed in the median but large shrubs or bushes (both in the median and outside the shoulders) might give the birds a landing spot where they could stop before attempting to cross the rest of the roadway. Any other measures to help animals overcome the barrier posed by this new transportation facility should be considered.

Albert Einstein said, “Smart people solve problems; geniuses prevent problems.” Let’s all be geniuses, and prevent these totally predictable, inevitable negative effects upon our magnificent state, our beautiful children, our citizens of all ages, our wildlife and unique Sonoran vegetation.

I am the President of a Green Valley AZ Homeowners Association. Our 1200 residents live right along I-19. We have endured the dramatic traffic noise increase over the three to four decades. Being seniors, we are all inherently vulnerable to lung and heart effects of pollution. But I am no more comfortable arguing for shifting the route towards our neighbors of any age. I’d like to see us all breathe freely. Sooner or later we all suffer. We see enough inversion pollution each summer within the Tucson area where quite enough pollution have blocking the mountains. No one wants a future that looks like old Los Angeles or Beijing.

You should have folks more expert than myself, perhaps from U of A or ASU who might be engaged in fleshing out a pollution mitigation plan to locked onto and accompany any highway construction plan. They are inseparable in my mind.

Albert Einstein said, “Smart people solve problems; geniuses prevent problems.” Let’s all be geniuses, and prevent these totally predictable, inevitable negative effects upon our magnificent state, our beautiful children, our citizens of all ages, our wildlife and unique Sonoran vegetation.

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Albert Einstein said, “Smart people solve problems; geniuses prevent problems.” Let’s all be geniuses, and prevent these totally predictable, inevitable negative effects upon our magnificent state, our beautiful children, our citizens of all ages, our wildlife and unique Sonoran vegetation.

Samantha Schippers

Dear ADOT,

For the proposed new roadway, please consider including wildlife crossings wherever possible. This would include at washes and the Santa Cruz River, and other locations where animals are known to migrate. The study area includes desert land that is not likely to be developed on the Tohono O’odham Nation, and it is important to maintain connectivity between that land and land to the south for animals migrating through the area. Also consider re-surfacing the footpath of the roadway (keep it as narrow as possible) so that birds (and bats and insects) can more easily fly across. I know trees would probably not be allowed in the median but large shrubs or bushes (both in the median and outside the shoulders) might give the birds a landing spot where they could stop before attempting to cross the rest of the roadway. Any other measures to help animals overcome the barrier posed by this new transportation facility should be considered.

Also, please consider using lighter-colored asphalt to minimize the heat island and global warming effects of this new roadway. Finally, given the presence of telescopes in the area please minimize the amount and intensity of lighting for the roadway.

Environmental Concerns

Wednesday, May 24, 2017 8:03 AM

Email

Dear Marian,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

June 16, 2017 at 1:45:16 PM MST

Kimberly Noetzel
Dear Gayle,

Kimberly Noetzel

With increasing truck traffic load between the Nogales port of entry and destinations north, I-10 carries too much traffic through Tucson. A bypass is needed. The proposed Sonoran Corridor is a good first step to alleviate this traffic. While not in the scope of this study, consideration should be given to a northeast bypass from approximately ParkLink Road to Reddington.

Sincerely,

Jennie Ginestea
Robert Brown

You proposal for a Sonoran Corridor is a great idea for NAFTA trucks, but if you want to put in a freeway that I believe people would appreciate more would be a route from a place at or near Marana to Oracle Junction to connect to route 77 and 79. The new current Twin Peaks exit and Tangerine Road will do nothing but trouble congestion into residential areas and not trim time off of people in transit to the northern cities and outdoor recreation areas of the state. The future projected growth and congestion for the area will overwhelm surface street progress from I-10 to N Oracle route 77. I actually live closer to your suggested corridor but would rather see a Marana Oracle corridor.

Travel Efficiency

4800 W Antun Rd
Tucson, Arizona 85706

Wednesday, June 07, 2017 8:51 AM

Email

Dear Mr. Brown,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

June 7, 2017 at 2:17:43 PM MST

Kimberly Noetzel

Tim Welk

I think that a six lane freeway is needed to connect I-10 and I-19. Traffic should be taken away from Kimberly Noetzel (520) 565-3911/Bruce Beausoleil (520) 323-1589/Phil and Donna Blasi (520) 295-1901.

Travel Efficiency

4800 W Antun Rd
Tucson, Arizona 85706

Thursday, June 08, 2017 10:43 AM

Email

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

June 12, 2017 at 3:40:32 PM MST

Kimberly Noetzel

Tom Pinder,

Acrow Corporation of America - BRIDGE

Please consider the use of temporary bridges (like the Acrow Bridge at I-10 and Craycroft Rd. in Tucson) for construction work to ease congestion, delays and improve overall safety of the driving public and the construction people working.

Travel Efficiency

Acrow Corporation of America-
1746 Cole Blvd. #225
Golden, CO 80401

Thursday, May 25, 2017 10:38 AM

Email

Dear Mr. and Mrs. Beausoleil,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

June 2, 2017 at 4:30:12 PM MST

Kimberly Noetzel

Phyllis and Donna Beausoleil

We are homeowners in Sahuarita. 15757 S Via Cayetano.

We are concerned with the effect the additional traffic load (mainly heavy truck) the connector will create. We are supportive of the action taken and the benefit to the Tucson area and Arizona commerce as a result of the action. To this end we believe the junction of the corridor to I-10 would best be served south of the Sahuarita road exit. Perhaps in the area of El Toro road.

Also, any place the proposed intersection occurs we would like considerations to noise barrier walls along the corridor and the entire affected areas to the increased future traffic load.

Travel Efficiency

15757 S Via Cayetano

Tuesday, May 30, 2017 7:47 PM

Email

Dear Mr. and Mrs. Beausoleil,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

June 2, 2017 at 4:30:12 PM MST

Kimberly Noetzel

On behalf of the Bureau of Indian Affairs (BIA), Western Region, I would like to offer the following comment(s) on the proposed Sonoran Corridor as it relates to issues and potential impacts to Indian trust lands:

The Tohono O’Odham Nation (TON), San Xavier District (District), overlaps about one-third to one-half of Interstate 10 in the Sonoran Corridor Location Map provided with scoping materials. There is a good chance then, that a traffic interchange (TI) may be located on the District. The BIA notes the following:

- The District and leadership expressed measured support for the project concept at the June 7, 2017, Agency Scoping Meeting. They recognize the economic development opportunity that a new freeway and associated TIs may afford the District and surrounding off-reservation communities. The BIA will support the TON and District should they want and agree to a corridor or alignment on tribal land and will work with the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) as needed to see the project through to development.
- Should the TON ultimately not support the project and its location on tribal land, you should be aware that BIA cannot grant right-of-way without the TON’s and/or allottee consent. Pre-planning and planning efforts involving all concerned would be paramount in the project’s success should it prove necessary.
- The BIA notes the comments and will enter your input into the project record.

Charles "Chip" Lewis

Bureau of Indian Affairs

The Tonto O’Odham Nation (TON), San Xavier District (District), overlaps about one-third to one-half of Interstate 10 in the Sonoran Corridor Location Map provided with scoping materials. There is a good chance then, that a traffic interchange (TI) may be located on the District. The BIA notes the following:

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- Should the TON ultimately not support the project and its location on tribal land, you should be aware that BIA cannot grant right-of-way without the TON’s and/or allottee consent. Pre-planning and planning efforts involving all concerned would be paramount in the project’s success should it prove necessary.
- The BIA notes the comments and will enter your input into the project record.

Environmental Concerns

Tuesday, June 27, 2017 8:28 AM

Email

The Santa Cruz River runs through the Corridor both on and off the District. Historic and pre-historic human occupation is well documented along and in the vicinity of the river’s multiple terraces, especially on the District. The sheer amount of sites located along the river or on the reservation may prove problematic legislatively and with the TON and District, factions of which may not be in favor of disturbance to these sensitive areas.

The Bureau of Reclamation (BOR), in cooperation with Bureau of Indian Affairs, the San Xavier District, and the TON, are currently working on an environmental assessment for the San Xavier Farm Extension Project. The project involves an approximately 1,094 acre extension of the existing San Xavier Cooperative Farm in order to meet the Secretary’s legal requirement under Section 304(1)(B) of the Arizona Water Settlement Act. The whole of the extension project is located within the Sonoran Corridor Study Area east of I-10. The BIA suggests you coordinate with the BOR project manager (Nichole Olds) to identify project overlap and any conflicts that may arise should a corridor/alignment be located within the farm extension boundaries and to include the project as part of the cumulative impacts analysis in the subject EIS. You might also want to discuss with BOR any responsibilities under the auspices of the Water Settlement Act that may be transferred/confirmed to FHWA/ADOT should the farm extension area be impacted.

Thank you for the opportunity to comment. Feel free to contact me should you have any questions and I am more than willing to meet in person should the need arise.
The Sonoran Corridor was rejected by Pima County voters in the 2015 bond election. We refused to approve $30 million to begin the necessary study process that ADOT is now doing.

The Sonoran Corridor has been touted as necessary to benefit Raytheon, the University of Arizona Tech Park, and the Tucson Airport. There is a public policy question as to using taxpayer dollars to benefit profitable enterprises. Raytheon’s annual net profit is $2.2 billion. Technically a non-profit, Tucson Airport Authority’s assets exceeded liabilities in 2014 by $365.7 million. The University Tech Park estimates its economic impact at $1.7 billion, generating $50 million in taxes. None need public assistance.

If the will of the voters and the financial good fortune of the beneficiaries mean nothing, then the most appropriate corridor would be a reasonably straight east-west line linking I-10 and I-19. It should not add the costs of additional miles by dropping south before reaching I-19. An alternative proposed by Pima County which appears to be a violation of Arizona’s gift clause.

The County Administrator’s proposed Pima County route would give a free access highway to an as-yet-unbuilt 3,000-acre Diamond Ventures Swan Southlands development. Don Diamond, a close ally of Chuck Huckleberry, raised at least $75,000 in legal and dark money campaign contributions for Huckleberry champion Sharon Bronson, Chair of the Board of Supervisors.

A more-or-less straight line would need resolution with the Tohono O’odham Nation’s San Xavier District with whom the County says it has a “partnership.” If a straight line is not possible, the Sonoran Corridor could jog north along the Old Nogales Highway, then west to I-19 without infringing on the Nation.

Another issue is Board of Supervisors Resolution 2007-343 which concludes, “... the Pima County Board of Supervisors opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological and urban form impacts could not be adequately mitigated.”

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A more-or-less straight line would need resolution with the Tohono O’odham Nation’s San Xavier District with whom the County says it has a “partnership.” If a straight line is not possible, the...
Don't Build It

To Whom It May Concern,

I am apposed to the proposed Sonoran Corridor. Just because Chuck Huckelberry calls this an "auxiliary interstate" that does not change the fact that it violates the Board of Supervisors Resolution 2007-343. It is on record that the Board of Supervisors themselves oppose construction of any new "highway" that has the stated purpose of bypassing the existing I-10. Just because Huckelberry has found a way for him and his "acquaintances" to profit from I-11 is not a reason to disregard this Resolution or to ignore the opposition from the many residents that just want to live in peace in an undisturbed Sonoran Desert.

Thank you for the E-mail that was sent out.

Why are you so insistent in tearing up the beautiful Sonoran Desert? If was wanted a Phoenix we would move there.

peace in an undisturbed Sonoran Desert.

disregard this Resolution or to ignore the opposition from the many residents that just want to live in peace in an undisturbed Sonoran Desert.

To Whom It May Concern,

The thought of this happening in our area makes me sick. It will ruin this area its so beautiful here why on earth would they do this keep up in the city where it belongs. I totally 100% apposed the proposed Sonoran Corridor plan.

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:26:47 AM MST

Kimberly Noetzel

Don't Build It

To Whom It May Concern,

It seems the Board of Supervisors and ADOT have forgotten a few things.

The Board of Supervisors Resolution 2007-343 which concludes, "...the Pima County Board of Supervisors opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, and urban form impacts could not be adequately mitigated."

As you know, the Sonoran Corridor was rejected by Pima County voters in the 2015 bond election. The voters never approved the millions ADOT is spending on the study process.

Using I-19 and I-10 or Old Nogales Highway would eliminate the extra expensive the County Administrators propose through the unbuilt 3,000 acre Diamond Ventures Sean Southlands development. It would also satisfy the Nation by passing the San Xavier District.

With the roads in Pima County in disrepair and grossly unsafe - remember Grant road? Voters can not continue to provide additional funds for Pima County's agendas. The Sonoran Corridor definitely qualifies as Pima County's own agenda. Taxpayers should not be forced to assist profitable enterprises like Raytheon, UnifA Tech Park and the Tucson Airport. Especially when Pima County doesn't properly use funds provided for road repairs. We don't need an "auxiliary interstate" - just maintain our current interstates.

We also don't need I-11 through Saguaro National Park West, and Ironwood Reserve to disrupt and destroy the communities, wildlife and archaeological riches of the area.

P.S. ND! - On raises for Mayor and Board of Supervisors!

Don't Build It

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:28:43 AM MST

Kimberly Noetzel

Dear Ms. Neff,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:25:54 AM MST

Kimberly Noetzel

To Whom It May Concern,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:27:38 AM MST

Kimberly Noetzel

Dear Ms. Porter,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:25:04 AM MST

Kimberly Noetzel

To Whom It May Concern,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:26:47 AM MST

Kimberly Noetzel

Dear Ms. Bell,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:26:47 AM MST

Kimberly Noetzel

Thank you for the E-mail that was sent out.

When are the people of Tucson gonna realize our City Managers have got to go.

And take all their back pocket supporters with them.

When are the people of Tucson gonna realize our City Managers have got to go.

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:28:43 AM MST

Kimberly Noetzel

Don't Build It

To Whom It May Concern,

Don't Build It

P.S.

Don't Build It

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:28:43 AM MST

Kimberly Noetzel
To whom it may concern,

I strongly oppose the Sonoran corridor for the following reasons:

1) The Sonoran Corridor was rejected by Pima County voters in the 2015 bond election. We refused to approve $30 million to begin the necessary study process that ADOT is now doing.

2) The Sonoran Corridor has been touted as necessary to benefit Raytheon, the University of Arizona Tech Park, and the Tucson Airport. There is a public policy question as to using taxpayer dollars to benefit profitable enterprises. Raytheon’s annual net profit is $3.2 billion. Technically a non-profit, Tucson Airport Authority’s assets exceeded liabilities in 2014 by $365.7 million. The University Tech Park estimates its economic impact at $1.7 billion, generating $50 million in taxes. None need public assistance.

3) If the will of the voters and the financial good fortune of the beneficiaries mean nothing, then the most appropriate corridor would be a reasonably straight east-west line linking I-10 and I-19. It should not add the costs of additional miles by dropping south before reaching I-19, an alternative proposed by Pima County which appears to be a violation of Arizona’s gift clause.

4) The County Administrator’s proposed Pima County route would give a free access highway to an as-yet-unbuilt 3,000-acre Diamond Ventures Son surroundings development. Don Diamond, a close ally of Chuck Huckelberry, raised at least $75,000 in legal and dark money campaign contributions for Huckelberry champion Sharon Bronson, Chair of the Board of Supervisors.

5) A more-or-less straight line would need resolution with the Tohono O’odham Nation’s San Xavier District with whom the County says it has “a partnership.” If a straight line is not possible, the Sonoran Corridor could jog north along the Old Nogales Highway, then west to I-19 without infringing on the Nation.

6) Another issue is Board of Supervisors Resolution 2007-343 which concludes, “…the Pima County Board of Supervisors opposes the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological and urban form impacts could not be adequately mitigated.” Huckelberry has tried to get around that by calling the Sonoran Corridor bypass as “auxiliary Interstate.”

Thank you for listening to the taxpayers, voters and citizens of this area.

I thoroughly oppose this proposed highway.

Don’t Build It

Thursday, July 06, 2017

9:14 PM

Email

Dear Ms. Matson,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 10, 2017 at 11:30:55 AM MST

Kimberly Noetzel

Catherine H. Moore

Good Afternoon,

Here is a completed Corridor Study

Not Related

Thursday, July 06, 2017

4:29 PM

Email

I have sent her the thank you email. Attached is her completed comment form for your files.

July 10, 2017 at 11:19:17 AM MST

Kimberly Noetzel

Bette Bunker Richards

Why are you persisting in this useless expenditure? Everyone is against it except the millionaire developer that will benefit by it. No one else sees a reason for it and the Pima County voters have already voted against it.

There are better routes and this one is a waste of money.

Why are the taxpayers being asked to pay for something to benefit private businesses?

I am writing in reference to the proposed Sonoran Corridor that Chuck Huckelberry wants to put through Aera Valley. I am opposed to this blatant waste of tax payer money to further real estate developers. It would be about 1/3 the cost to put it through the already existing Tucson freeway system, and a boon to the Tucson economy. The only ones to make money from the bypass would be Huckelberry, Don Diamond and Sharon Bronson (and their cronies). Haven’t we had enough of this kind of politics? Please let the city of Tucson profit from this and not the few who are willing to do nothing for money.

Don’t Build It

Thursday, July 06, 2017

9:14 PM

Email

Dear Bette,

Thank you for providing your input on the proposed Sonoran Corridor.

July 10, 2017 at 11:34:08 AM MST

Kimberly Noetzel

Betsy Minton

I am writing in reference to the proposed Sonoran Corridor that Chuck Huckelberry wants to put through Aera Valley. I am opposed to this blatant waste of tax payer money to further real estate developers. It would be about 1/3 the cost to put it through the already existing Tucson freeway system, and a boon to the Tucson economy. The only ones to make money from the bypass would be Huckelberry, Don Diamond and Sharon Bronson (and their cronies). Haven’t we had enough of this kind of politics? Please let the city of Tucson profit from this and not the few who are willing to do nothing for money.

Don’t Build It

Tuesday, July 11, 2017

7:38 PM

Email

Dear Ms. Matson,

Thank you for providing your input on the proposed Sonoran Corridor.

July 13, 2017 at 9:35:53 AM MST

Kimberly Noetzel

Beryl Baker

Am AGAINST the Sonoran Corridor and have been since first hearing about for the concept for many reasons including economical and environmental as well as social impact on communities.

Don’t Build It

Thursday, July 13, 2017

7:36 AM

Email

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 13, 2017 at 9:36:52 AM MST

Kimberly Noetzel

Beryl Baker

Forgot to sign a name.

Beryl Baker

West side resident for over 40 years.

Not Related

Thursday, July 13, 2017

7:36 AM

Email

Duly noted – thank you.

July 13, 2017 at 9:36:52 AM MST

Kimberly Noetzel
Robin Barnes  
ASARCO

Not Related  
Wednesday, July 12, 2017  
Email

Dear Robin,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your letter on behalf of ASARCO dated July 10, 2017, and we will enter your input into the project record.

If you have additional comments or questions, please feel free to contact me or email SonoranCorridor@azdot.gov.

July 13, 2017 at 9:48:08 AM MST  
Kimberly Noetzel

Allison Moore  
Fresh Produce Association of the Americas (FPAA)

Economic Development  
Friday, July 14, 2017 3:47 PM  
Email

Thank you for providing your input on the proposed Sonoran Corridor on behalf of the Fresh Produce Association of the Americas (FPAA). This email confirms that we have received your comments and will enter your input into the project record.

July 17, 2017 at 10:09:14 AM MST  
Kimberly Noetzel

Dorothy Taylor

Don't Build It  
Zip: 85743  
Saturday, July 15, 2017 1:42 PM  
Email

Dear Ms. Taylor,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we have received your comments and will enter your input into the project record.

July 17, 2017 at 10:13:06 AM MST  
Kimberly Noetzel

Al Wiruth

I am aware that I am a day late but hopefully my comments can be added. Sorry I don’t have a scanned copy of the form that I could make my comments on.

I don’t use I-19 so I cannot comment on question one.

As for question 2 I would list other as number 1. I think that the route selected should be down by Sahuarita Road if the idea is to relieve traffic congestion on I-10. The route should connect with Nogales. However Nogales south of I-10 will need to be widened to accept the additional traffic. ADOT does not need to propose and build a road that gives the appearance of providing assisting for residential land developers who may own land south of TIA. I cannot comment on archeological or cultural sites in areas south of TIA as I don’t know that area very well.

As for question 3, I would assign number 1 to other. There are problems with the water table in the area south and southwest of TIA having potential hazardous and dangerous chemicals. I think ADOT needs to be careful that they don’t potentially cause more problems in this area by building a road for a lot of vehicle traffic.

Geology, soils assigned nr 7

Water resources number 6

Air Quality nr 5

Biological resources 4

Visual and aesthetics 8

Rest are blank

Question 4: I haven’t been to Sahuarita so I am not sure if the Sahuarita Road goes through residential areas. A corridor for heavy truck traffic should avoid residential areas as much as possible if nothing else for air quality in the homes and schools.

Sunday, July 16, 2017 9:52 PM  
Email

Dear Mr. Wiruth,

Thank you for providing your input on the proposed Sonoran Corridor. This email confirms that we received your comments on July 16, 2017.

July 17, 2017 at 10:15:15 AM MST  
Kimberly Noetzel
<table>
<thead>
<tr>
<th>From</th>
<th>Agency</th>
<th>Comment</th>
<th>Topic</th>
<th>Phone Number</th>
<th>Date Received</th>
<th>Medium</th>
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<tr>
<td>Judy Hayes</td>
<td>Green Valley</td>
<td>Votes in favor of I-10 and I-19 connection.</td>
<td>Build It</td>
<td>208-447-6000</td>
<td>Wednesday, May 24, 2017 3:04 PM</td>
<td>Phone</td>
</tr>
</tbody>
</table>
Appendix G - Cooperating Agency Response Letters
Ms. Karla S. Petty
Division Administrator
Federal Highway Administration
4000 North Central Avenue
Suite 1500
Phoenix, Arizona 85012-3500

Dear Ms. Petty:

Thank you for inviting the Federal Aviation Administration as a cooperating agency in the Federal Highways Administration’s and Arizona Department of Transportation’s Tier 1 Environmental Impact Statement (EIS) for the Sonoran Corridor between Interstate 19 (I-19) and Interstate 10 (I-10), located south of the Tucson International Airport. The FAA accepts your invitation.

Our primary concerns are related to potential impacts of the proposed highway corridor on various federally obligated airports and their operations. Thus, we will limit our participation in the EIS to portions that are within about a mile of an airport or an FAA navigational aid within the corridor.

Please contact Kyler Erhard, Lead Program Manager, in our Phoenix Airports District Office at 602-792-1073 or via email to kyler.erhard@faa.gov. Mr. Erhard will be the FAA’s point of contact for this EIS.

Sincerely,

Mark A. McClardy
Director, Office of Airports
Western-Pacific Region

Cc: PHX-600, AWP-610
Mr. Tremaine Wilson  
FHWA Environmental Coordinator  
Sonoran Corridor Tier 1 EIS  
Federal Highway Administration  
4000 North Central Avenue, Suite 1500  
Phoenix, AZ  85012

Dear Mr. Wilson,

The Coronado National Forest appreciates the invitation to become a Cooperating Agency with the Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) for the Tier 1 Environmental Impact Statement (EIS) study for the Sonoran Corridor between Interstate 19 and Interstate 10. As currently understood, the FHWA and ADOT are evaluating several potential 2000-feet wide corridor options that may impact a portion of the Coronado National Forest.

We hereby request to become a Participating Agency with the FHWA and ADOT on this proposed project to better understand associated potential effects to Coronado National Forest. I, along with my staff, appreciate the opportunity and look forward to future coordination with the FHWA and ADOT. We support your efforts to conduct environmental analysis for the proposed Sonoran Corridor, pursuant to the National Environmental Policy Act.

If you have any questions, please contact our Acting Environmental Coordinator, Mindi Lehew. Ms. Lehew may be reached via electronic mail at mlehew@fs.fed.us or by telephone at 520-388-8352.

Sincerely,

KERWIN S. DEWBERRY  
Forest Supervisor
Mr. Ammon Heier  
Area Engineer  
Federal Highway Administration  
4000 North Central Avenue Suite 1500  
Phoenix, AZ 85012

Dear Mr. Heier:

The National Park Service (NPS) has reviewed the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) Notice of Intent (NOI) to prepare a Tier 1 Environmental Impact Statement (EIS) for the Interstate 1-10 and Interstate I-19 Corridors in Pima County. We appreciate having the opportunity to provide our initial thoughts and comments about how this project may affect units of the National Park System. This proposal has the potential to impact resources specifically related to Juan Bautista de Anza National Historic Trail, San Xavier del Bac Mission and Air Force Missile Site 8 National Historic Landmarks.

Juan Bautista de Anza National Historic Trail

The Juan Bautista de Anza National Historic Trail (Anza NHT) appreciates the opportunity to provide information for the upcoming preparation of the Tier 1 EIS for the Sonoran Corridor Between I-10 and I-19 in Pima County, Arizona. Our comments address potential impacts to the Juan Bautista de Anza National Historic Trail, due to our responsibility to administer, coordinate, preserve and enhance this component of the National Trails System.

The Anza NHT historic corridor begins at the United States border in Nogales and follows the Santa Cruz River through Pima County to the northern border with Pinal County. In Pima County, the NPS works directly with Pima County Office of Sustainability and Conservation and Farmers Investment Company (FICO) in our effort to create a contiguous multi-use recreation retracement trail near or within the historic corridor of the Anza NHT. Much of this recreational retracement trail has been completed in Pima County. The GIS data can be provided upon request.

The corridor study vicinity intersects with the historic corridor of the Anza NHT and potentially with existing recreation retracement trail, an official component of the National Historic Trail as defined in the 1996 Anza NHT Comprehensive Management and Use Plan. Coordination should be conducted with the Anza NHT to ensure that impacts are properly identified and disclosed and that appropriate mitigation is proposed if necessary to protect the Anza NHT resources.

For any clarification of our comments or for further information relevant to the Anza NHT, please contact Naomi Torres, Superintendent, Anza NHT (415) 623-2340 (Naomi_torres@nps.gov) or BriAnna Weldon, Outdoor Recreation Planner (415) 623-2343 (brianna_weldon@nps.gov).
San Xavier del Bac Mission and Air Force Missile Site 8 National Historic Landmarks

Please be aware that there are two National Historic Landmarks (NHL) located within the sonoran corridor vicinity, the San Xavier del Bac Mission and the Air Force Missile Site 8 (Titan II ICBM Site 571-7). On October 9, 1960, San Xavier del Bac Mission was designated as an NHL as it is an outstanding example of a Baroque designed church built by Papago laborers supervised by Spanish-American master craftsmen. It is the most spectacular remnant of the Spanish mission system in the United States territory. It has served the Papago Indians since it was founded in 1700 by the Jesuit Eusebio Francisco Kino. The present church is the third, perhaps the fourth, on the site. The Titan II Missile Site 8 (571-7) NHL designated on April 19, 1994 is the sole remaining Titan II Intercontinental Ballistic Missile (ICBM) complex of the 54 sites that were "on alert" during the Cold War between 1963 and 1987. As such, it is of exceptional national significance as the single remaining example of the liquid-fueled ICBM missile launch facilities utilized by the Strategic Air Command. To the maximum extent possible, efforts should be made to minimize any potential impacts to these sites, following in accordance with the National Historic Preservation Act (NHPA).

Section 110(f) of the NHPA requires that “prior to the approval of any Federal undertaking, which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking.” Moreover, as stated in 36 CFR Part 800.10(c), federal agencies are required to notify the Secretary of the Interior (delegated to the National Park Service) of any consultation involving an undertaking at an NHL and invite the Secretary to participate in the consultation where there may be an adverse effect. Adverse effects are not limited to direct impacts and include visual effects.

For any clarification of our comments or for further information relevant to the National Historic Landmarks, please contact Skylar Bauer, Archeologist Heritage Partnerships Program, (303) 969-2842 or by email skylar_bauer@nps.gov.

Sincerely,

Melissa R. Trenchik
Chief, Environmental Quality
Tremaine Wilson  
Environmental Coordinator  
FHWA Arizona Division  
4000 N Central Ave, Suite 1500  
Phoenix, AZ 85012

Subject: Sonoran Corridor Tier One (1) Environmental Impact Statement (EIS) Scoping Comments

To Whom It May Concern:

The Bureau of Reclamation has reviewed the Federal Highway Administration (FHWA) and Arizona Department of Transportation’s (ADOT) Notice of Intent that was published in the Federal Register on May 12, 2017, for the Sonoran Corridor Tier 1 EIS. We appreciate the opportunity to comment on the project. The following comments are provided for your consideration.

As required by Public Law 97-293, the Southern Arizona Water Rights Settlement Act (SAWRSA) of 1982, as amended and restated in Public Law 108-451, the Arizona Water Settlement Act (AWSA) of 2004, Reclamation has constructed a water delivery and distribution system, an irrigation system with associated flood protection features, and proposes to construct an additional irrigation system with associated flood protection features in the project vicinity. These constructed and planned facilities could be directly impacted by the proposed interchange development corridor between I-19 and I-10.

SAWRSA and the AWSA directed the Secretary of the Interior, acting through Reclamation, to acquire and annually deliver Central Arizona Project (CAP) water to the San Xavier District of the Tohono O’odham Nation in settlement of water rights claims. To deliver the CAP water, Reclamation built the 5.6-mile-long underground pipeline (referred to as the CAP Link Pipeline) in 2000. The CAP Link Pipeline links the CAP Canal and the San Xavier Cooperative Farm. It spans from just north of Pima Mine Road to the existing water distribution system located at the south end of the existing San Xavier Cooperative Farm. The permanent pipeline right-of-way (a gravel service road above the pipeline alignment) is 5.6 miles in length and 8 to 10 feet in width, or about 6.1 acres in size. Though the alignment begins west of I-19 at the CAP Canal, it does cross I-19 in two locations heading north to the San Xavier Cooperative Farm. A majority of the CAP Link Pipeline occurs on the east side of I-19 within the proposed project area for the Sonoran Corridor. The reason for constructing the pipeline east of I-19 is the existing San Xavier District well field and future farm extension are located on this side of the freeway.
should also be noted that during construction of the CAP Link Pipeline, federally protected species were identified and relocated. In 2007, Reclamation rehabilitated the existing San Xavier Cooperative Farm, which is mostly west of I-19. However, three associated fields occur east of I-19 within the proposed project area for the Sonoran Corridor.

Future development pursuant to SAWRSA and AWSA is being planned and designed in the proposed interchange vicinity, which could also be impacted by the Sonoran Corridor Project. Reclamation in cooperation with the San Xavier District of the Tohono O’odham Nation and the Bureau of Indian Affairs is currently preparing an Environmental Assessment for the San Xavier Farm Extension Project. The project involves an approximate 1,094-acre extension of the existing San Xavier Cooperative Farm in order to meet the Secretary’s legal requirement under Section 304(c)(2) of AWSA. The entire extension project is located within the Sonoran Corridor study area.

Pursuant to Reclamation’s obligations from SAWRSA and AWSA, we have an interest in ensuring that the proposed Sonoran Corridor does not impact our ability to implement the Indian water rights settlement. We would also request that FHWA and ADOT consider Reclamation’s obligations as the EIS alternatives are developed. Furthermore, we would ask that you coordinate with the Central Arizona Water Conservation District and ourselves regarding potential impacts to the CAP Canal, which terminates on the west side of I-19 at Pima Mine Road. We have enclosed a figure that describes the constructed, and planned facilities.

Thank you for the opportunity to provide Scoping Comments on the Sonoran Corridor Tier 1 EIS. We look forward to working with you on this project. If you have any questions, please contact me at 623-773-6250 or Ms, Nichole Olsker at 623-773-6258, or via email at nolsker@usbr.gov.

Sincerely,

[Signature]

Sean M. Heath
Manager, Environmental Resource Management Division
cc: Honorable Austin G. Nunez
    Chairman
    Tohono O'odham Tribal Council
    P.O. Box 837
    Sells, AZ 85634

    Tom Fitzgerald
    Supervisor, Land and Surveys
    Central Arizona Water Conservation District
    P.O. Box 43020
    Phoenix, AZ 85080-3020

    Ms. Velma Begay
    SAWRSA Project Office
    San Xavier District
    2018 West San Xavier Road
    Tucson, AZ 85746
Figure 1. San Xavier Cooperative Farm Extension Project Area
Mr. Tremaine Wilson  
Environmental Coordinator  
Federal Highway Administration  
4000 North Central Avenue, Suite 1500  
Phoenix, AZ 85012  

Subject: Scoping Comments and Response to Cooperating Agency Invitation for the Tier 1 Environmental Impact Statement for the Sonoran Corridor, Pima County, Arizona  

Dear Mr. Wilson:

The United States Environmental Protection Agency (EPA) has reviewed the Federal Register Notice published May 12, 2017, requesting comments on the Federal Highway Administration proposal to prepare a Tier 1 Draft Environmental Impact Statement (Draft EIS) for the Sonoran Corridor between Interstate 19 (I-19) and Interstate 10 (I-10), located south of the Tucson International Airport. Our enclosed comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

FHWA has requested that EPA become a Cooperating Agency for the Sonoran Corridor project in a May 26, 2017 letter. EPA accepts FHWA’s invitation to become a Cooperating Agency [as defined in 23 CFR § 771.111 (d)]. As a Cooperating Agency, EPA anticipates providing comments on the Purpose and Need, Range of Alternatives, Draft EIS, and at other milestones where we believe we can contribute to avoidance and minimization of potential impacts to resources during the development of the EIS. If it is anticipated that future projects tiering from this EIS will require an Individual Permit pursuant to Clean Water Act Section 404, we would also like to review and comment on the corridor alternative most likely to contain the Least Environmentally Damaging Practicable Alternative (LEDPA). We look forward to working with FHWA to ensure that our early coordination assists both of our agencies in meeting our statutory missions. EPA’s participation as a Cooperating Agency does not constitute formal or informal approval of any part of this project under any statute administered by EPA, nor does it limit in any way EPA’s independent review of the Draft and Final EISs pursuant to Section 309 of the Clean Air Act.

EPA commends the efforts of FHWA in coordinating with our agency, as well as multiple other agencies and municipalities, to seek extensive feedback regarding the potential environmental impacts inherent in the construction of this new transportation corridor. Given the location of the project in an area that is largely undeveloped, continued early coordination with stakeholders in the project area will likely be your greatest asset to ensure a robust NEPA evaluation of the project’s environmental impacts and benefits. Please see the following recommendations for consideration as the NEPA process continues.
Range of Alternatives

EPA recommends that FHWA 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 multi-modal options. EPA recommends that Alternatives be focused in currently disturbed areas, where feasible, in order to minimize impacts from further growth-inducement and habitat loss that may result from the proposed project. The no build alternative must be evaluated as a benchmark against which to compare both the performance and environmental consequences of the other project alternatives.

A substantial benefit of analyzing a potential multi-modal corridor is the opportunity to collocate vehicular transportation facilities with rail, utility, bicycle, and green energy facilities, thus consolidating the right-of-way needed for each. EPA strongly supports combining projects into a single corridor wherever possible in order reduce the cumulative environmental impact of building multiple dispersed projects. In light of the DOT Policy Statement on Bicycle and Pedestrian Accommodation (https://www.fhwa.dot.gov/environment/bicycle_pedestrian/index.cfm), EPA recommends that FHWA include bicyclists and pedestrians as an integral element of transportation project design and provide all modes an equal level of priority in design decisions.

Recommendations:

- Coordinate with the Federal Transit Administration (FTA) and Federal Rail Administration (FRA) in the design and analysis of potential transit and rail options for inclusion in the corridor alternatives. In exploring the option to enhance rail and transit access, clearly identify what forms of rail and transit facilities are currently in operation in the project area and note any plans for future expansion. Furthermore, we recommend identifying activities that can be undertaken by FHWA, and/or other responsible agencies, to enhance rail and transit ridership and effectively increase overall mobility throughout the region;
- Include details of specific design elements proposed to provide bicycle access, either within the project right-of-way, or along adjacent frontage roads;
- Explore the option of including utility and/or green energy production facilities within the proposed project corridor. Many transportation agencies have demonstrated the viability of utilizing the highway right-of-way for renewable energy production and transmission, as well as for use in electric vehicle charging stations and in powering corridor-related infrastructure. More information can be found on the National Transportation Library website at http://ntl.bts.gov/lib/51000/51800/51866/Alternative_Uses_Rights_Way.pdf

Environmental Design and Maintenance

EPA recommends that FHWA commit to building a state-of-the-art transportation corridor that incorporates the highest levels of environmental design and energy efficiency available into construction and maintenance. The project offers an opportunity for FHWA to provide a clear vision for how the new corridor would be built and maintained in a manner that reduces use of energy and resources.
Recommendations:

- Identify measures to conserve water and manage stormwater runoff. We recommend commitments to implement “green infrastructure” in onsite stormwater management features, such as bioretention areas, vegetated swales, porous pavement, and filter strips. These features can serve as both stormwater treatment and visual enhancements. More detailed information on these forms of “green infrastructure” can be found at https://www.epa.gov/green-infrastructure.
- Identify potential measures to produce renewable energy onsite that can be incorporated into design of project facilities.
- Commit to use recycled industrial materials in the construction of project facilities. Nonhazardous industrial materials, such as coal ash, foundry sand, construction and demolition materials, slags, and gypsum, are valuable products of industrial processes. Industrial materials recycling preserves natural resources by decreasing the demand for virgin materials; conserves energy and reduces greenhouse gas emissions by decreasing the demand for products made from energy intensive manufacturing processes; and saves money by decreasing disposal and materials costs.

Water Resources

Given the proximity to important aquatic resources, including the Santa Cruz River, Box Canyon Wash, Pantano Wash, and Cienaga Creek, among many other unnamed ephemeral and intermittent drainages, this 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 U.S. require authorization by the U.S. Army Corps of Engineers (Corps) under CWA Section 404. The Federal Guidelines at 40 CFR Part 230 promulgated under CWA Section 404 (b)(1) provide substantive environmental criteria that must be met to permit such discharges into waters of the United States.

The purpose of the Guidelines is to restore and maintain the chemical, physical, and biological integrity of waters of the United States. These goals are achieved, in part, by controlling discharges of dredged or fill material (40 CFR 230.1(a)). Fundamental to the Guidelines is the principle that dredged or fill material should not be discharged into the aquatic ecosystem, unless it can be demonstrated that there is no less environmentally damaging practicable alternative that achieves an applicant’s project purpose. In addition, no discharge can be permitted if it will cause or contribute to significant degradation of the waters of the United States, cause or contribute to a violation of a State water quality standard, or jeopardize a federally listed species.

EPA is particularly concerned about the number of ephemeral and intermittent washes that have the potential to be impacted in the project area, the majority of which drain to the northwest and have a hydrological connection to the Santa Cruz River. Ephemeral washes perform a diversity of hydrologic and biogeochemical functions that directly affect the integrity and functional condition of higher-order waters downstream. Washes provide hydrologic connectivity within the watershed, facilitating the movement of water, sediment, nutrients, wildlife, and plant propagules throughout the watershed. Washes are responsible for a large portion of basin ground-water recharge in arid and semi-arid regions through channel infiltration and transmission losses. These ephemeral systems contribute to the biogeochemical functions of waters within their watershed by storing,
cycling, transforming, and transporting elements and compounds. Ephemeral washes also provide habitat for breeding, shelter, foraging and movement of wildlife.¹

Given the extent of the potential impacts associated with the proposed project, FHWA must clearly demonstrate that the preferred alternative for the corridor is the least environmentally damaging practicable alternative (LEDPA) that achieves the overall project purpose while not causing or contributing to significant degradation of the aquatic ecosystem. Identification of the LEDPA is achieved by performing an alternatives analysis that estimates the direct, indirect, and cumulative impacts to jurisdictional waters resulting from each corridor alternative considered. At the Tier 1 level, we encourage FHWA to present enough information to ensure that the corridor chosen is the corridor most likely to contain the LEDPA. To ensure the alternatives analysis serves its intended purpose as a planning and screening tool, EPA also encourages FHWA to meet and discuss project alternatives with the Corps and EPA early in the planning process. Engaging in discussions during the Tier 1 NEPA process will lead to better coordination and understanding of project history once the Tier 2 project-level analyses are initiated.

**Waters Assessment**

The waters assessment for each alternative should be of an appropriate scope and detail to identify sensitive areas or aquatic systems with functions highly susceptible to change. We recommend that FHWA present enough information in the Tier 1 Draft EIS in order to provide decision-makers with adequate detail to compare corridor-level impacts to aquatic resources and make a determination of which corridor will have fewer impacts to aquatic resources.

**Recommendations:**

- Include the classification and geographic extent of waters and adjacent riparian areas.
- Characterize the functional condition of waters and adjacent riparian areas.
- Include information on wildlife species and sensitive plant taxa that could reasonably be expected to occur in waters or associated riparian habitat.
- Characterize the hydrologic linkage to any impaired water body.

**Avoidance and Minimization Measures**

To demonstrate compliance with CWA Guidelines, FHWA must explore on-site alternatives to avoid or minimize impacts to specific waters. Typically, transportation projects can accomplish this by using spanned crossings, arched crossings, or oversized buried box culverts over drainages to encourage continuity of sediment transport and hydrological processes and wildlife passage. It is appropriate at the Tier 1 NEPA phase to identify potential sites for crossings and identify types of crossings that will result in the least damage to aquatic resources.

**Recommendations:**

- Include an analysis of major drainage crossings which identifies and prioritizes the potential for improvements to the aquatic system and for wildlife use at each crossing.
- Estimate permanent and temporary impacts to waters of the U.S. for each alternative in the Tier 1 Draft EIS; for example, acres of waters impacted. For each alternative, report these numbers in table form for each impacted water and wetland feature.
- Include in the Draft EIS a commitment to use newer technology culverts and less damaging culverts such as large bottomless or arched culverts and a commitment to span washes and major waterway crossings. While newer techniques to reduce impacts may be available in the future when tier 2 projects are implemented, it is appropriate to commit to best available technologies at this time (along with an estimate of the resources that can be avoided by integrating these techniques).

**Biological Resources and Impacts to Wildlife**

Several special-status wildlife and plant species have the potential to occur within the project area including the Yellow-billed Cuckoo (*Coccyzus americanus*), Sonoran Desert Tortoise (*Gopherus morafkai*), Lesser Long-nosed Bat (*Leptonycteris curasoae yerbabuena*), Pima Pineapple Cactus (*Coryphantha scheeri var. robustispina*), and Nichol Turk’s Head Cactus (*Echinocactus horizontalionus var. nicholii*), among many others. EPA recommends that the Draft EIS describe the extent and nature of any protected species and their primary habitat(s) and the extent and nature of potential impacts to that habitat. Efforts to avoid and/or minimize impacts to special-status species and their associated habitat(s) should also be presented. EPA recommends continued early coordination with the Arizona Game and Fish Department (AZGFD) and U.S. Fish and Wildlife Service (FWS) in order to avoid and minimize project impacts to biological resources to the greatest extent possible.

**Recommendations:**

- Identify all petitioned and listed threatened and endangered species within the project area and assess which species might be directly or indirectly affected by each corridor alternative.
- Provide discussion of narrow endemics, unique habitat elements, and suitable habitat for native fauna and flora in the project area and the extent to which each proposed corridor alternative may affect each resource.
- Incorporate information developed for the Arizona Wildlife Linkages Assessment and identify how corridor alternatives will be designed to allow for continued or improved wildlife movement.
- Document coordination with the FWS and AZGFD regarding appropriate avoidance, minimization, and mitigation measures to address impacts to special-status species.

**Air Quality**

EPA recommends that the Draft EIS fully describe the current air quality conditions, potential impacts to air quality from the construction and operation of the proposed project, and any mitigation measures to reduce adverse impacts for each fully evaluated alternative.
Recommendations:

- Provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), criteria pollutant nonattainment areas, and potential air quality impacts of the project (including cumulative and indirect impacts) for each corridor alternative.
- Include an analysis of potential impacts from the construction and operation of the proposed alternatives. Include monitoring data, any anticipated exceedances of NAAQS, and estimates of all criteria pollutant emissions.
- Disclose the available information about the health risks associated with construction emissions, sensitive receptors in the vicinity of the project area, and how the proposed project will affect current emissions levels.
- Identify any specific actions proposed by FHWA to reduce emissions from the project, including industrial materials re-use, park and ride facilities, use of low or zero-emissions construction equipment, and inclusion of alternative fuel and green technology infrastructure.

Cumulative Impact Analysis

Cumulative impacts are defined in the Council on Environmental Quality’s (CEQ) NEPA regulations as the impact on the environment that results from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such actions (40 CFR 1508.7). The cumulative impacts analysis should provide the context for understanding the magnitude of the impacts of the alternatives by analyzing the impacts of other past, present, and reasonably foreseeable projects or actions and then considering those cumulative impacts in their entirety. These actions include both transportation and non-transportation activities. Where adverse cumulative impacts are identified, EPA recommends that FHWA disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts (CEQ's Forty Most Frequently Asked Questions #19).

Recommendations:

- Consider transportation and non-transportation projects such as large-scale developments and urban planning projects that are reasonably foreseeable and are identified within city and county planning documents.
- Describe the “identifiable present effects” to various resources attributed to past actions. The purpose of considering past actions is to determine the current health of resources. This information forms the baseline for assessing potential cumulative impacts and can be used to develop cooperative strategies for resources protection. Identify the current condition of the resource as a measure of past impacts. For example, the percentage of wetlands lost to date or percentage of sensitive species habitat lost to date.
- Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends. Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or static.
- Consider using the Caltrans cumulative impacts guidance, which is applicable to analyses for projects outside the state of California. This guidance can be found at [http://www.dot.ca.gov/ser/cumulative_guidance/purpose.htm](http://www.dot.ca.gov/ser/cumulative_guidance/purpose.htm).
Growth-related Indirect Impact Analysis

EPA is concerned about the potential indirect impacts of this project related to growth-inducement. Improved access to undeveloped areas may affect the location and timing of growth on surrounding lands, leading to indirect impacts to air quality, waters, wildlife, and many other resources of concern. The project would benefit from an analysis of growth-related impacts early in project development. A growth-related impact analysis assists with compliance requirements of NEPA by considering environmental consequences as early as possible and providing a well-documented and sound basis for government decision making.

Recommendations:
- Consider using the Guidance for Preparers of Growth-related, Indirect Impact Analyses [http://www.dot.ca.gov/ser/Growth-related_IndirectImpactAnalysis/gri_guidance.htm] which was coauthored by FHWA, Caltrans, and EPA and is applicable to impact analyses for projects outside of California.
- Identify if the project will affect the location and/or timing of planned growth in the area. Specifically, the analysis should identify the potential resources that may be affected by the increased “zone of influence” associated with interchanges and impacting resources outside of the right-of-way.
- Ground truth the results of your growth-related indirect impact analysis by enlisting local expertise involved in land use issues, such as local government officials, land use and transportation planners, home loan officers, and real estate representatives. Use their collective knowledge to validate or modify the results of your analysis.
- Identify the types of resources that are likely to occur in geographic areas that may be affected by growth. If it is determined that there will be no, or insignificant, impacts to resources of concern, then document the analysis process and report the results.
- Include a discussion of actions that can be taken during project development to foster the implementation of smart growth strategies in the project area, including limiting the number of exits, increasing distance between exits, and working with transit and rail providers to ensure multi-modal opportunities are available between small communities and job centers. Additionally, we urge FHWA to coordinate with local municipalities in the pursuit of zoning ordinances that encourage smart growth, thus reducing the project’s potential for impacts related to growth-inducement.

Environmental Justice

The Draft EIS should identify whether the proposed corridor alternatives may disproportionately and adversely affect low income or minority populations in the surrounding area and should discuss appropriate mitigation measures for any adverse impacts. Executive Order 12898 addresses Environmental Justice in minority and low-income populations, and the CEQ has developed guidance concerning how to address Environmental Justice in the environmental review process [https://www.epa.gov/environmentaljustice/ceq-environmental-justice-guidance-under-national-environmental-policy-act]. Additionally, the recently released Promising Practices for Environmental Justice Methodologies in NEPA Reviews [https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices-ej-methodologies-nepa-reviews] is a compilation of methodologies from current agency practices identified by the NEPA Committee of the Federal Interagency
Working Group on Environmental Justice. The document focuses on the interface of environmental justice considerations through NEPA processes and provides recommendations on applying EJ methodologies that have been established in federal NEPA practice.

**Recommendations:**

- Consider *Promising Practices for EJ Methodologies in NEPA Reviews* when developing the EJ section of the Draft EIS.
- Identify how the proposed corridor alternatives may affect the mobility of low-income or minority populations in the surrounding area.
- Discuss potential mitigation measures for any anticipated adverse impacts to community members that could result from future tier 2 projects.
- Include opportunities for incorporating public input to promote context sensitive design, especially in minority and low-income communities.
- Document the process used for community involvement and communication, including all measures to specifically outreach to low-income and minority communities. Include an analysis of results achieved by reaching out to these populations.

We look forward to maintaining our strong working relationship with FHWA as we continue to coordinate on the proposed Sonoran Corridor between I-19 and I-10. If you have any questions or concerns regarding our comments, please feel free to contact me at 415-972-3370 or meek.clifton@epa.gov.

Sincerely,

Clifton Meek  
Environmental Review Section

Cc via email: Ammon Heier, Federal Highway Administration  
Carlos Lopez, Arizona Department of Transportation  
Jesse Rice, U.S. Army Corps of Engineers  
Kristin Terpening, Arizona Game and Fish Department  
Robert Lehman, U.S. Fish and Wildlife Service
June 13, 2017

Ms. Karla S. Petty  
Division Administrator, Arizona Division  
Federal Highway Administration  
4000 North Central Avenue Suite 1500  
Phoenix, Arizona 85012-3500

Dear Ms. Petty:

I am responding to your letter dated May 26, 2017 to Colonel Gibbs, Los Angeles District Commander, inviting the Corps of Engineers (Corps) to be a Cooperating Agency in the Federal Highway Administration’s (FHWA) Tier I Environmental Impact Statement (EIS) for the proposed Sonoran Corridor between Interstate 19 and Interstate 10, located south of the Tucson International Airport (project). The Corps attended the June 7, 2017 Agency Scoping Meeting via webinar and has reviewed the Federal Register notice published May 12, 2017, requesting public and agency input on the proposed project. Our enclosed scoping comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), Corps Regulatory Program regulations (33 CFR Part 325 Appendix B), and the provisions of Fixing America’s Surface Transportation Act (FAST Act).

We appreciate the early coordination on this corridor project and accept FHWA’s invitation to become a Cooperating Agency in the EIS. As a Cooperating Agency, the Corps anticipates providing comments on the Purpose and Need, Range of Alternatives, Draft and Final EIS, and at other times where we believe we can contribute feedback that will avoid or minimize potential impacts to aquatic resources within our jurisdiction. We also anticipate being involved with periodic coordination meetings with the Lead Agency and reviewing draft technical studies relevant to our jurisdiction or special expertise. The Corps’ participation as a Cooperating Agency should not be interpreted as a guarantee of permit issuance. However, early coordination with the Corps will ensure that the NEPA evaluation will be thorough as well as useful in meeting our regulatory needs for the corridor alternative that may be selected as a result of this EIS. Below is a summary of our comments.

Aquatic Resources
Implementation of any project proposed as a result of the Tier 1 EIS and subsequent Tier 2 analysis may require the discharge of fill material into waters of the United States (U.S.), which is regulated by the Corps under Section 404 of the Clean Water Act. Therefore, each corridor alternative should be evaluated using a quantitative approach in order to determine the potential impacts to aquatic resources. Information such as National Wetlands Inventory data, the National Hydrography Dataset, satellite imagery, and topographic, soil, and vegetation maps can be used to determine an approximate acreage and classification of aquatic resources while
identifying high value or sensitive resources in the study area. While the issuance of an approved or preliminary jurisdictional determination is not anticipated to be a part of the Tier 1 EIS process, this information should be presented in a manner that provides decision-makers with sufficient detail to compare corridor-level impacts to aquatic resources and make a determination of which corridor will have fewer impacts to aquatic resources.

**Avoidance and Minimization**
Corridor alternatives should be developed that avoid and/or minimize impacts to potentially jurisdictional aquatic resources, particularly those with high values such as the Santa Cruz River. The Tier 1 evaluation should consider how various corridor options could leverage the use of existing waterway crossings as well as the feasibility of constructing new crossings in existing corridors in a manner that would reduce the distribution of impacts across the watershed and minimize the impacts associated with connectivity and habitat fragmentation (e.g., oversized buried box culverts, arch culverts, or bridges with increased span widths). While newer techniques may be available when Tier 2 evaluation commences, committing to use these best available techniques and providing an estimate of the aquatic resources that would be avoided is appropriate at the Tier 1 level of analysis. Considering these options early in the process will benefit aquatic resources and possibly reduce or eliminate Section 404 permitting requirements for the project.

**Alternatives Analysis**
The Section 404(b)(1) Guidelines (see 40 CFR Part 230) provide criteria that must be met for the Corps to permit discharges of dredged or fill material into waters of the United States. The purpose of the Clean Water Act and the Guidelines are to restore and maintain the chemical, physical, and biological integrity of waters of the U.S. through the control of discharges of dredged or fill material. The Guidelines state that discharges of dredged or fill material will not be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem. An alternative is deemed practicable if it is available and capable of being done after taking into consideration cost, logistics, and technology in light of the overall project purpose. In addition, no discharge can be permitted if it will cause or contribute to significant degradation of the waters of the U.S., cause or contribute to a violation of a State water quality standard, or jeopardize species listed as threatened or endangered under the Endangered Species Act.

Given the potential adverse environmental impacts associated with the proposed activities, the Tier 1 EIS should present sufficient information that demonstrates that the preferred corridor alternative is the corridor most likely to result in a Tier 2 project that would be the least environmentally damaging practicable alternative (LEDPA) that achieves the overall project purpose while not causing or contributing to significant degradation of the aquatic ecosystem. Identification of the Tier 2 LEDPA is achieved by performing analyses that estimate the likely direct, indirect, and cumulative impacts to jurisdictional aquatic resources resulting from alternative project designs.
Thank you for the invitation to be a Cooperating Agency and the opportunity to provide our scoping comments. We look forward to working with your staff on the development of the Tier 1 EIS to ensure the document fulfills our independent NEPA requirements as a Federal agency with jurisdiction by law. The point of contact for the Corps regarding this proposed project is Mr. Jesse Rice, Regulatory Project Manager in the Regulatory Division’s Arizona Branch. If you have questions, you may contact him at (602) 230-6854 or Jesse.M.Rice@usace.army.mil.

Sincerely,

David J. Castanon
Chief, Regulatory Division
July 14, 2017

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

Re: Scoping Comments for the Sonoran Corridor Tier I Environmental Impact Statement

Dear Mr. Wilson:

The Arizona Game and Fish Department appreciates this opportunity to provide preliminary scoping comments regarding the potential impacts to wildlife, wildlife habitat, and wildlife-related recreation within the Sonoran Corridor study area. In addition to identifying potential impacts to sensitive resources within the study area, we have also identified potential data needs and mitigation opportunities for your consideration. Our comments below are in addition to comments previously provided at the June 7, 2017 scoping meeting.

As soon as any alignments for analysis have been identified, we request shapefiles of those alignments be provided to the Department. This will enable us to provide additional detail to the Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) regarding wildlife, wildlife habitat, and wildlife-related recreation resources along alternative alignments.

General Comments

Wildlife Movement

Transportation infrastructure compromises the natural movement of mammals, reptiles, and amphibians, and to some extent birds. The barrier effect on wildlife results from a combination of disturbance and avoidance effects, physical hindrances, and traffic mortality that all reduce the amount of movement across the barrier (Forman and Alexander 1998; Trombulak and Frissell 2000; Jaeger and Fahrig 2001; Carr et al. 2002). The Sonoran Corridor will be a significant component of a larger transportation network that contributes to regional fragmentation, degradation, isolation, mortality and barrier effects on wildlife, wildlife populations, and wildlife habitats. The study area for the Sonoran Corridor clearly corresponds with a portion of the earlier proposed I-10 Phoenix-Tucson Bypass Study (Route 4), of which the Arizona Game and Fish Commission unanimously opposed all proposed routes (Arizona Game and Fish Commission, 2007). In our scoping comments for the I-11 Tier I EIS, and in this letter we reiterate this position. Therefore, the Sonoran Corridor should be evaluated at a landscape scale, considering its contribution to the cumulative impacts of a larger infrastructure network. This evaluation...
should occur at both the Tier I and Tier II levels of NEPA analysis. Additionally, ensuring the safe and effective movement of wildlife through the Sonoran Corridor also improves safety for the motoring public by reducing the likelihood of wildlife-vehicle interactions and accidents.

- Throughout the Sonoran Corridor, the Department urges FHWA and ADOT to analyze and employ existing transportation facilities to the greatest degree feasible, in order to limit the significant impacts to resources along new transportation facilities.

- In order to adequately evaluate wildlife movement within the Sonoran Corridor, studies should be conducted to gather empirical movement data of target wildlife species across any proposed alignments that would be fully evaluated under NEPA. Ideally, the studies should be conducted prior to any Tier II level evaluation, so the data can be incorporated into the refined Tier II analysis. In addition to pre-construction surveys, the Department recommends collection of movement data for target species during and for at least four years following construction, and considers this an essential component of any mitigation strategy. Therefore, the Department seeks written commitment from the FHWA and ADOT, within the Tier I EIS, to conduct future wildlife movement and habitat use studies in conjunction with any Tier II level efforts. These studies should include at a minimum, GPS telemetry studies of collared animals, wildlife mortality (i.e., roadkill) and tracking surveys, analysis of existing and collected movement data, and examination of traffic data in conjunction with these studies. These studies should be used to help inform the design and siting of comprehensive measures to mitigate and minimize barrier effects to wildlife, including but not limited to crossing structures. Additional methods using camera traps, scat surveys, various small mammal traps or herpetological arrays could be used to examine biodiversity and local wildlife distribution patterns, in conjunction with movement data.

- A comprehensive network of crossing structures including underpasses, culverts, funnel fencing, and other components should be included from the initial design stages. The Department seeks written commitment from FHWA and ADOT, within the Tier I EIS, to coordinate with the Department on the overall siting and design of roadway construction and/or expansions, including crossing structures, as the Tier II level efforts progress.

- Preliminary wildlife linkages were identified by the Department, in collaboration with Northern Arizona University (NAU), in 2007-2008 (Beier et al. 2006), and with Pima County in 2011-2012 (AGFD 2012). Since the linkages were identified, understanding of connectivity and methodologies to identify corridors has improved. Therefore, these linkages are just starting points when looking at connectivity issues for a specific area, and are not a substitute for coordinating with the Department regarding the critical connectivity issues along the Sonoran Corridor. However, each linkage report contains biological information related to that particular linkage area; the Department recommends incorporating relevant information from the reports into the Tier I Draft EIS. Reports are available at: http://corridordesign.org/linkages/arizona. Specific wildlife corridors within the study area vicinity are the Rincon – Santa Rita – Whetstone and the Santa Rita – Tumacacori Linkage Designs.

**Wildlife**

To assist your team in the NEPA analysis for the proposed Sonoran Corridor project, we have provided an Arizona Environmental Online Review Tool Report, which delineates the study area
as the roughly southern boundary of the Tucson International Airport, I-10, SR 83, Sahuarita Road, and I-19. We recommend you run your own report again (perhaps several times) during the NEPA process as your study area limits may change from what we’ve used, and we update the database of species’ occurrences every six months.

Species listed under the federal Endangered Species Act known to occur within a three-mile buffer of the defined study area are the yellow-billed cuckoo (Western DPS; *Coccyzus americanus*), Pima pineapple cactus (*Coryphantha scheeri var. robustispina*), Nichol Turk’s head cactus (*Echinocactus horizonghalonius var. nicholii*), lesser long-nosed bat (*Leptonycteris curasoeae yerbabuenae*), and Gila topminnow (*Poeciliopsis occidentalis occidentalis*). Additionally, several other special status species are also documented or predicted within the study area, including the Sonoran desert tortoise (*Gopherus morafkai*), which is protected under a Candidate Conservation Agreement, of which ADOT is a signatory.

Definitions of the different status categories can be found at [https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/](https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/). In addition to including all listed and candidate species, your analysis should also address Arizona Tier 1A Species of Greatest Conservation Need (SGCN). The Arizona Game and Fish Department’s State Wildlife Action Plan (SWAP) provides a comprehensive vision for managing Arizona’s fish, wildlife and wildlife habitats for a 10-year period. To be eligible for annual State Wildlife Grant funding, each of the 56 U.S. states and territories must have an approved SWAP that includes eight required elements. Tier 1A species are those considered vulnerable in at least one of those eight categories, and matches at least one of 5 additional criteria.

<table>
<thead>
<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>SGCN</th>
<th>FWS</th>
<th>USFS</th>
<th>BLM</th>
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### Species of Greatest Conservation Need Predicted within Project Vicinity based on Predicted Range Models

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<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>SGCN</th>
<th>FWS</th>
<th>USFS</th>
<th>BLM</th>
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<td>Northern Mexican Gartersnake</td>
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The SWAP also identifies Species of Economic and Recreation Importance (SERI) for the State of Arizona.

- The Department recommends that potential impacts to, as well as appropriate avoidance and minimization measures for federally listed and state trust species be addressed in the NEPA analysis at an appropriate level of detail for a Tier I analysis: focusing on the siting of the alignments. The attached Arizona Online Environmental Review Tool Report provides a list of SGCN and SERI predicted within the project vicinity based on species range models.

### Wildlife Habitat

It is the Department’s policy to seek compensation at a 100% level, when feasible, for actual or potential habitat losses resulting from land and water projects (Department policy I2.3). The Department recommends that all impacts to habitat be mitigated in-kind (i.e., impacts to Sonoran Desert scrub habitat should be mitigated with Sonoran Desert scrub habitat), through a combination of on-site impact avoidance and/or minimization when feasible, and off-site preservation, creation, or compensation.

In addition to the typical effects to wildlife movement discussed above, pollution by toxins, nutrients, and noise from the transportation corridor can create edge effects on adjacent hydrology and microclimate, reducing the suitability of the remaining habitats (Garland and Bradley 1984; Thompson et al. 1986; Lytle et al. 1995; Boarman and Sazaki 2006; Parris and Schneider 2009). These indirect effects spread into the surrounding landscape and contribute to the loss and degradation of natural habitat several times larger than the area of the road footprint itself. The indirect effects are influenced by road and traffic characteristics, landscape topography and hydrology, wind, and vegetation. In addition, the consequent impacts on wildlife and ecosystems also depend on the sensitivity of the species in the vicinity.

- Opportunities exist to minimize new edge effects. These include:
  - Constructing new or expanded roads along existing infrastructure, instead of creating new infrastructure corridors. The Department urges FHWA and ADOT to consider and exhaust these opportunities to minimize edge effects when identifying and analyzing potential alignments.
  - Building walls to deflect noise and light disturbances away from otherwise quality habitat.
  - Designing lighting to illuminate the roadway and not the night sky or adjacent habitat.
The Department has been engaged in various land use planning efforts for several years with local partners such as the Bureau of Land Management (BLM), ADOT, Pima County Natural Resources, Parks, and Recreation, National Park Service, and the Regional Transportation Authority (RTA) of the Pima Association of Governments (PAG), the Coalition for Sonoran Desert Protection (CSDP), Tucson Audubon Society, Tohono O’odham Nation, and Sky Island Alliance (SIA) to develop strategies and commitments to conserve wildlife habitat linkages connecting the sky islands and desert valleys.

We recommend additional coordination with the Department, RTA, CSDP, Audubon, SIA, and Pima County to familiarize FHWA and ADOT with local conservation efforts and alternative solutions that these organizations and their stakeholders are pursuing.

The Department trusts our scoping comments for the Sonoran Corridor Tier I EIS will aid FHWA and ADOT in your alternative selection and evaluation; we will provide additional information on future data needs and mitigation opportunities as the study progresses. We continue to look forward to collaborating with FHWA and ADOT on this important transportation project. If you have any questions or wish to further discuss our comments and concerns, please contact me at kterpening@azgfd.gov or 520-388-4447.

Sincerely,

Kristin Terpening
Habitat, Evaluation and Lands Specialist, Region V

cc via email: Clifton Meek, U.S. Environmental Protection Agency
Robert Lehman, U.S. Fish and Wildlife Service
Scott Richardson, U.S. Fish and Wildlife Service

AGFD# M17-05301923

Attachment: Arizona Environmental Online Review Tool Report
REFERENCES CITED


Arizona Game and Fish Department Mission
To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

Project Name:
Sonoran Corridor

Project Description:
Sonoran Corridor

Project Type:
Transportation & Infrastructure, New roadway facilities, Roadway rest areas, emergency pull offs, run away truck ramps, cinder storage, additional storage or maintenance areas

Contact Person:
Cheri Boucher

Organization:
Arizona Game and Fish Department

On Behalf Of:
OTHER

Project ID:
HGIS-05755

Please review the entire report for project type and/or species recommendations for the location information entered. Please retain a copy for future reference.
Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. HabiMap Arizona data, specifically Species of Greatest Conservation Need (SGCN) under our State Wildlife Action Plan (SWAP) and Species of Economic and Recreational Importance (SERI), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

Locations Accuracy Disclaimer:
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.
Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.

2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).

3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.

4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.

5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:

Project Evaluation Program, Habitat Branch
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086-5000
Phone Number: (623) 236-7600
Fax Number: (623) 236-7366
Or
PEP@azgfd.gov

6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies.
Sonoran Corridor
Aerial Image Basemap With Locator Map

- Project Boundary
- Buffered Project Boundary

Project Size (acres): 93,162.86
Lat/Long (DD): 32.0244 / -110.6602
County(s): Pima
AGFD Region(s): Tucson
Township/Range(s): T15S, R13E; T15S, R14E; T15S, R15E
USGS Quad(s): CORONA DE TUCSON; MOUNT FAGAN

Service Layer Credits: Sources: Esri, HERE, DeLorme, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong),
Sonoran Corridor
Web Map As Submitted By User

Project Size (acres): 93,162.86
Lat/Long (DD): 32.0244 / -110.8602
County(s): Pima
AGFD Region(s): Tucson
Township/Range(s): T15S, R13E; T15S, R14E; T15S, R15E
USGS Quad(s): CORONA DE TUCSON; MOUNT FAGAN

Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, & OpenStreetMap contributors, and the GIS User Community
Sonoran Corridor
Topo Basemap With Township/Ranges and Land Ownership

Project ID: HGIS-05755  Review Date: 7/12/2017 11:49:30 AM

Project Size (acres): 93,162.86
Lat/Long (DD): 32.0244 / -110.8602
County(s): Pima
AGFD Region(s): Tucson
Township/Range(s): T15S, R13E; T15S, R14E; T15S, R15E
USGS Quad(s): CORONA DE TUCSON; MOUNT FAGAN

Sources: Esri, HERE, DeLorme, Intermap, Increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisscanto, MapmyIndia, & OpenStreetMap contributors, and the GIS User Community
### Special Status Species and Special Areas Documented within 3 Miles of Project Vicinity

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<tr>
<th>Scientific Name</th>
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<th>FWS</th>
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### Special Status Species and Special Areas Documented within 3 Miles of Project Vicinity

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<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>FWS</th>
<th>USFS</th>
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*Note: Status code definitions can be found at [https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/](https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/).*

### Species of Greatest Conservation Need

*Predicted within Project Vicinity based on Predicted Range Models*

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<th>Scientific Name</th>
<th>Common Name</th>
<th>FWS</th>
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<td>Gopherus morafkai</td>
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<td>Lasiurus blossevillii</td>
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<td>Lasiurus xanthinus</td>
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<td>Leopardus pardalis</td>
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<td>Lithobates tarahumarea</td>
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<td>Melozone aberti</td>
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<td>Myiarchus tuberculifer</td>
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<td>Myiodynastes luteiventris</td>
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<td>Notiosorex cockrumi</td>
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<td>Nyctinomops femorosaccus</td>
<td>Pocketed Free-tailed Bat</td>
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<tr>
<td>Odocoileus virginianus</td>
<td>White-tailed Deer</td>
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<td>Panthera onca</td>
<td>Jaguar</td>
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<td>Passerculus sandwichensis</td>
<td>Savannah Sparrow</td>
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## Species of Greatest Conservation Need

**Predicted within Project Vicinity based on Predicted Range Models**

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<thead>
<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>FWS</th>
<th>USFS</th>
<th>BLM</th>
<th>NPL</th>
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<td>Peucaea botterii arizonae</td>
<td>Arizona Botteri's Sparrow</td>
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<tr>
<td>Peucaea carpalis</td>
<td>Rufous-winged Sparrow</td>
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<tr>
<td>Phrynosoma solare</td>
<td>Regal Horned Lizard</td>
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<td>Phyllorhynchus browni</td>
<td>Saddled Leaf-nosed Snake</td>
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<td>Picoides arizonae</td>
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<td>Poecilophis occidentalis occidentalis</td>
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<td>Progne subis hesperia</td>
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<td>Sceloporus slevini</td>
<td>Slevin's Bunchgrass Lizard</td>
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<td>Senticolis triaspis</td>
<td>Green Ratsnake</td>
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<td>Sonorella eremita</td>
<td>San Xavier Talusssnail</td>
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<td>Tadarida brasiliensis</td>
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<td>Tantilla wilcoli</td>
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<td>Tantilla yaquia</td>
<td>Yaqui Black-headed Snake</td>
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<tr>
<td>Terrapene ornata</td>
<td>Ornate Box Turtle</td>
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<td>Thamnophis eques megalops</td>
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<td>Thomomys umbrinus intermedius</td>
<td>Southern Pocket Gopher</td>
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<td>Troglodytes pacificus</td>
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<td>Vulpes macrotis</td>
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## Species of Economic and Recreation Importance

**Predicted within Project Vicinity**

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<td>Callipepla squamata</td>
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<td>Odocoileus virginianus</td>
<td>White-tailed Deer</td>
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<td>Patagioenas fasciata</td>
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<td>Pecari tajacu</td>
<td>Javelina</td>
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<tr>
<td>Puma concolor</td>
<td>Mountain Lion</td>
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<td>Zenaida asiatica</td>
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<td>Zenaida macroura</td>
<td>Mourning Dove</td>
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Project Type: Transportation & Infrastructure, New roadway facilities, Roadway rest areas, emergency pull offs, run away truck ramps, cinder storage, additional storage or maintenance areas

Project Type Recommendations:
Fence recommendations will be dependent upon the goals of the fence project and the wildlife species expected to be impacted by the project. General guidelines for ensuring wildlife-friendly fences include: barbless wire on the top and bottom with the maximum fence height 42", minimum height for bottom 16". Modifications to this design may be considered for fencing anticipated to be routinely encountered by elk, bighorn sheep or pronghorn (e.g., Pronghorn fencing would require 18" minimum height on the bottom). Please refer to the Department's Fencing Guidelines located on Wildlife Friendly Guidelines page, which is part of the Wildlife Planning button at https://www.azgfd.com/wildlife/planning/wildlifeguidelines/.

During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife. Guidelines for many of these can be found at: https://www.azgfd.com/wildlife/planning/wildlifeguidelines/.

Consider impacts of outdoor lighting on wildlife and develop measures or alternatives that can be taken to increase human safety while minimizing potential impacts to wildlife. Conduct wildlife surveys to determine species within project area, and evaluate proposed activities based on species biology and natural history to determine if artificial lighting may disrupt behavior patterns or habitat use. Use only the minimum amount of light needed for safety. Narrow spectrum bulbs should be used as often as possible to lower the range of species affected by lighting. All lighting should be shielded, canted, or cut to ensure that light reaches only areas needing illumination.

Minimize potential introduction or spread of exotic invasive species. Invasive species can be plants, animals (exotic snails), and other organisms (e.g., microbes), which may cause alteration to ecological functions or compete with or prey upon native species and can cause social impacts (e.g., livestock forage reduction, increase wildfire risk). The terms noxious weed or invasive plants are often used interchangeably. Precautions should be taken to wash all equipment utilized in the project activities before leaving the site. Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245). See Arizona Department of Agriculture website for restricted plants, https://agriculture.az.gov/. Additionally, the U.S. Department of Agriculture has information regarding pest and invasive plant control methods including: pesticide, herbicide, biological control agents, and mechanical control, http://www.usda.gov/wps/portal/usdahome. The Department regulates the importation, purchasing, and transportation of wildlife and fish (Restricted Live Wildlife), please refer to the hunting regulations for further information https://www.azgfd.com/hunting/regulations.

Follow manufacturer's recommended application guidelines for all chemical treatments. The U.S. Fish and Wildlife Service, Region 2, Environmental Contaminants Program has a reference document that serves as their regional pesticide recommendations for protecting wildlife and fisheries resources, titled "Recommended Protection Measures for Pesticide Applications in Region 2 of the USFWS", http://www.fws.gov/southwest/es/arizona/Documents/ECReports/RPMPA_2007.pdf. The Department recommends that direct or indirect impacts to sensitive species and their forage base from the application of chemical pesticides or herbicides be considered carefully.

Based on the project type entered, coordination with the Environmental Protection Agency may be required (http://www.epa.gov/).

Based on the project type entered, coordination with State Historic Preservation Office may be required (http://azstateparks.com/SHPO/index.html).
Design culverts to minimize impacts to channel geometry, or design channel geometry (low flow, overbank, floodplains) and substrates to carry expected discharge using local drainages of appropriate size as templates. Reduce/minimize barriers to allow movement of amphibians or fish (e.g., eliminate falls). Also for terrestrial wildlife, washes and stream corridors often provide important corridors for movement. Overall culvert width, height, and length should be optimized for movement of the greatest number and diversity of species expected to utilize the passage. Culvert designs should consider moisture, light, and noise, while providing clear views at both ends to maximize utilization. For many species, fencing is an important design feature that can be utilized with culverts to funnel wildlife into these areas and minimize the potential for roadway collisions. Guidelines for culvert designs to facilitate wildlife passage can be found on the home page of this application at https://www.azgfd.com/wildlife/planning/wildlifeguidelines/.

Based on the project type entered, coordination with Arizona Department of Environmental Quality may be required (http://www.azdeq.gov/).

Based on the project type entered, coordination with U.S. Army Corps of Engineers may be required (http://www.usace.army.mil/)

Based on the project type entered, coordination with County Flood Control district(s) may be required.

**Project Location and/or Species Recommendations:**

HDMS records indicate that one or more native plants listed on the Arizona Native Plant Law and Antiquities Act have been documented within the vicinity of your project area. Please contact: Arizona Department of Agriculture

1688 W Adams St.
Phoenix, AZ 85007
Phone: 602.542.4373
https://agriculture.az.gov/environmental-services/np1

HDMS records indicate that one or more listed, proposed, or candidate species or Critical Habitat (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at http://www.fws.gov/southwest/es/arizona/ or:

- **Phoenix Main Office**
  2321 W. Royal Palm Rd, Suite 103
  Phoenix, AZ 85021
  Phone: 602-242-0210
  Fax: 602-242-2513

- **Tucson Sub-Office**
  201 N. Bonita Suite 141
  Tucson, AZ 85745
  Phone: 520-670-6144
  Fax: 520-670-6155

- **Flagstaff Sub-Office**
  SW Forest Science Complex
  2500 S. Pine Knoll Dr.
  Flagstaff, AZ 86001
  Phone: 928-556-2157
  Fax: 928-556-2121

HDMS records indicate that Western Burrowing Owls have been documented within the vicinity of your project area. Please review the western burrowing owl resource page at: https://www.azgfd.com/wildlife/speciesofgreatestconservneed/burrowingowlmanagement/.

HDMS records indicate that Sonoran Desert Tortoise have been documented within the vicinity of your project area. Please review the Tortoise Handling Guidelines found at: https://www.azgfd.com/wildlife/nongamemanagement/tortoise/

The analysis has detected one or more Important Bird Areas within your project vicinity. Please see http://aziba.org/?page_id=38 for details about the Important Bird Area(s) identified in the report.
Analysis indicates that your project is located in the vicinity of an identified wildlife habitat linkage corridor. Project planning and implementation efforts should focus on maintaining adequate opportunities for wildlife permeability. For information pertaining to the linkage assessment and wildlife species that may be affected, please refer to: http://www.corridordesign.org/arizona. Please contact your local Arizona Game and Fish Department Regional Office for specific project recommendations: https://www.azgfd.com/Agency/Offices.

Tribal Lands are within the vicinity of your project area and may require further coordination. Please contact:
Tohono O'odham Nation
PO Box 837
Sells, AZ 85634
(520) 383-2028
(520) 383-3379 (fax)