



# FEIS APPENDIX D – AGENCY NOTIFICATION AND COMMENTS ON THE DRAFT TIER 1 EIS

October 2021

# APPENDIX D: AGENCY NOTIFICATION AND COMMENT LETTERS ON THE DRAFT TIER 1 EIS

## NOTIFICATION LETTERS

Notification letters on the availability of the Draft Tier 1 EIS sent to Cooperating and Participating Agencies, Tribal Allottees, and Section 106 Consulting Parties appear on the following pages.

- Notification to Cooperating Agencies of Availability of the Draft Tier 1 EIS
- Notification to Participating Agencies of Availability of the Draft Tier 1 EIS
- Section 106 Continuing Consultation letter on Availability of the Draft Tier 1 EIS, public hearing/engagement, and review of Revised Programmatic Agreement
- Notification to San Xavier District allottees to participate in the Sonoran Corridor Study



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

November 05, 2020

In Reply Refer To:

410-A(BFI)  
TRACS No: 410 PM 0.0 P9100 05P  
Sonoran Corridor Tier 1 EIS  
Notice of Draft Tier 1 EIS Availability

Dear Cooperating Agencies,

The Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) are pleased to announce that the Draft Tier 1 Environmental Impact Statement (Draft Tier 1 EIS) for the Sonoran Corridor study in Pima County, Arizona will soon be available for public review. The Draft Tier 1 EIS was prepared in accordance with the National Environmental Policy Act (NEPA), and is distributed for public review and comment pursuant to NEPA and Section 106 of the National Historic Preservation Act.

The Notice of Availability for the Draft Tier 1 EIS is expected to be published in the Federal Register on November 6, 2020, and will be followed by a review and comment period ending on January 8, 2021. The Draft Tier 1 EIS will be available on the project's website at: <https://azdot.gov/planning/transportation-studies/sonoran-corridor-tier-1-environmental-impact-statement/documents>.

In your role as a Cooperating Agency in this environmental review process, we request review of the Draft Tier 1 EIS and written comments by January 8, 2021. Please submit comments to:

Email: [Projects@azdot.gov](mailto:Projects@azdot.gov)  
Mail: Sonoran Corridor Tier 1 EIS Study Team  
c/o Joanna Bradley  
1221 South Second Avenue, MD T100  
Tucson, AZ 85713

We request that you consolidate all comments from your agency into one official set of comments, sent on (or attached to) your agency's letterhead. It is helpful to FHWA and ADOT to receive comments on:

- Any alternative or mitigation strategy you support or oppose and why,
- The analysis of environmental impacts and performance of alternatives, and/or
- Information that is incomplete or incorrect.

A Public Hearing will be held to provide project information and accept formal comments on the Draft Tier 1 EIS. Date and location of the Public Hearing is provided below. Because of public health concerns and government requirements, attendance will be limited to provide for adequate social distancing. Participants must pre-register to reserve time to attend the Public Hearing in person. Please sign up at <https://tinyurl.com/SonCor> or call (520) 327-6077 (bilingual) to reserve a time slot to attend the Public Hearing.



***PUBLIC HEARING***

**Tuesday, December 1, 2020, 5p.m.–8 p.m.**  
DoubleTree Suites – Tucson International Airport  
Ballroom Royale  
7051 South Tucson Boulevard  
Tucson, AZ 85756

In addition, you can participate in the Virtual Public Engagement event either online or by phone. The Virtual Public Engagement event supplements the Public Hearing, and it provides another opportunity for you to give official, recorded comments on the Draft Tier 1 EIS. To participate in the Virtual Public Engagement event, follow the online access link or call the phone access number provided below.

***VIRTUAL PUBLIC ENGAGEMENT EVENT***

**Thursday, December 3, 2020, 5p.m. – 8p.m.**

- **Online Access:** [bit.ly/SCEIS2020](https://bit.ly/SCEIS2020) ( or you can use the full webex link:  
<https://meetings.webex.com/meetings/onstage/g.php?MTID=e755bc109da6c91bac638939e717a2837> )
  - Meeting Number (Access code): 146 242 8979
  - Event Password: SCEIS2020
- **Phone Access:** 1 (408) 418-9388
  - Meeting Number (Access code): 146 242 8979

For further questions about document access, the review and comment period, or additional information, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, at [tremaine.wilson@dot.gov](mailto:tremaine.wilson@dot.gov) or (602) 382-8970; or Samuel Patton, ADOT Project Manager, at [spatton@azdot.gov](mailto:spatton@azdot.gov) or (602) 712-6168.

Thank you for your continued interest in the Sonoran Corridor Tier 1 EIS.

Sincerely,

Karla S. Petty  
Division Administrator

TREMAINE LUMUSS WILSON  
By: Tremaine L. Wilson  
Civil Rights/Realty Specialist

Digitally signed by TREMAINE LUMUSS WILSON  
Date: 2020.11.04 09:39:15 -0700





U.S. Department  
of Transportation  
**Federal Highway  
Administration**

ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
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November 05, 2020

In Reply Refer To:

410-A(BFI)  
TRACS No: 410 PM 0.0 P9100 05P  
Sonoran Corridor Tier 1 EIS  
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Email: [Projects@azdot.gov](mailto:Projects@azdot.gov)  
Mail: Sonoran Corridor Tier 1 EIS Study Team  
c/o Joanna Bradley  
1221 South Second Avenue, MD T100  
Tucson, AZ 85713

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- The analysis of environmental impacts and performance of alternatives, and/or
- Information that is incomplete or incorrect.

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***PUBLIC HEARING***

**Tuesday, December 1, 2020, 5p.m.–8 p.m.**  
DoubleTree Suites – Tucson International Airport  
Ballroom Royale  
7051 South Tucson Boulevard  
Tucson, AZ 85756

In addition, you can participate in the Virtual Public Engagement event either online or by phone. The Virtual Public Engagement event supplements the Public Hearing, and it provides another opportunity for you to give official, recorded comments on the Draft Tier 1 EIS. To participate in the Virtual Public Engagement event, follow the online access link or call the phone access number provided below.

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**Thursday, December 3, 2020, 5p.m. – 8p.m.**

- **Online Access:** [bit.ly/SCEIS2020](https://bit.ly/SCEIS2020) ( or you can use the full webex link:  
<https://meetings.webex.com/meetings/onstage/g.php?MTID=e755bc109da6c91bac638939e717a2837> )
  - Meeting Number (Access code): 146 242 8979
  - Event Password: SCEIS2020
- **Phone Access:** 1 (408) 418-9388
  - Meeting Number (Access code): 146 242 8979

For further questions about document access, the review and comment period, or additional information, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, at [tremaine.wilson@dot.gov](mailto:tremaine.wilson@dot.gov) or (602) 382-8970; or Samuel Patton, ADOT Project Manager, at [spatton@azdot.gov](mailto:spatton@azdot.gov) or (602) 712-6168.

Thank you for your continued interest in the Sonoran Corridor Tier 1 EIS.

Sincerely,

Karla S. Petty  
Division Administrator

TREMAINE LUMUSS  
WILSON

Digitally signed by TREMAINE LUMUSS  
WILSON  
Date: 2020.11.04 09:38:07 -07'00'

By: Tremaine L. Wilson  
Civil Rights/Realty Specialist



ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

November 20, 2020

In Reply Refer To:

410-A(BFI)  
TRACS No. 410 PM 0.0 P9100 05P  
Sonoran Corridor Tier 1 EIS  
Continuing Section 106 Consultation  
Revised Draft Tier 1-level Programmatic Agreement and  
Draft Environmental Impact Statement

Ms. Kathryn Leonard, State Historic Preservation Officer  
1100 West Washington Street  
Phoenix, Arizona 85007

SHPO-2017-0664

Dear Ms. Leonard:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are preparing a Tier 1 Environmental Impact Statement (EIS) for the Sonoran Corridor, pursuant to the National Environmental Policy Act (NEPA). The corridor study area is located between Interstate 19 (I-19) and Interstate 10 (I-10), south of the Tucson International Airport, in Pima County, Arizona. The proposed Sonoran Corridor is a federal undertaking subject to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations (Title 36, Code of Federal Regulations Part 800). FHWA is the federal lead agency and ADOT is the local project sponsor for the Tier 1 EIS under NEPA.

Consulting parties for the project include ADOT, the Ak-Chin Indian Community, Arizona Board of Regents, Arizona Department of Corrections, Arizona State Land Department, Arizona State Museum (ASM), Arizona State Historic Preservation Office (SHPO), Bureau of Indian Affairs (BIA; Western Regional Office), Bureau of Land Management (BLM; Tucson Field Office), City of South Tucson, City of Tucson, Federal Aviation Administration (FAA), FHWA, Gila River Indian Community (GRIC), Hopi Tribe, Mescalero Apache Tribe, National Park Service (Anza Trail Administrative Office), Pascua Yaqui Tribe, Pima County, Pima County Regional Flood Control District, Salt River Pima-Maricopa Indian Community, Tohono O'odham Nation (Four Southern Tribes lead), Tonto Apache Tribe, Town of Sahuarita, Tucson Airport Authority (TAA), the UNS Energy Corporation / Tucson Electric Power, U.S. Army Corps of Engineers, U.S. Forest Service (Coronado National Forest), Trico Electric Cooperative, Union Pacific Railroad, Western Area Power Administration, and Yavapai-Apache Nation. The Advisory Council on Historic Preservation (ACHP), San Carlos Apache Tribe, U.S. Fish and Wildlife Service, and White Mountain Apache Tribe have declined to participate in further Section 106 consultation.

Previous consultation described the undertaking, discussed corridor alternatives, identified consulting parties, explained methodological processes, distributed cultural resource reports, and



circulated a draft programmatic agreement for review. FHWA and ADOT are continuing consultation at this time to inform consulting parties of release of the Draft Tier 1 EIS for public review, and to provide a revised Draft Programmatic Agreement for review.

The Notice of Availability (NOA) for the Draft Tier 1 EIS was published in the Federal Register on November 6, 2020, and has a review and comment period that ends on January 8, 2021. The Draft Tier 1 EIS is available for your review and can be found at:

<https://azdot.gov/planning/transportation-studies/sonoran-corridor-tier-1-environmental-impact-statement/draft>

Comments on the Draft Tier 1 EIS can be sent to:

- At the Public Hearing or the Virtual Public Engagement event
- Online: [www.azdot.gov/sonorancorridor](http://www.azdot.gov/sonorancorridor)
- Phone: 855.712.8530 (bilingual)
- Email: [sonorancorridor@azdot.gov](mailto:sonorancorridor@azdot.gov)
- USPS Mail: ADOT Communications  
c/o Joanna Bradley  
1221 South Second Avenue  
Tucson, AZ 85713

A Public Hearing will be held to provide project information and accept formal comments on the Draft Tier 1 EIS. Date and location of the Public Hearing is provided below. Because of public health concerns and government requirements, attendance will be limited to provide for adequate social distancing. Participants must pre-register to reserve time to attend the Public Hearing in person. Please sign up at <https://tinyurl.com/SonCor> or call (520) 327-6077 (bilingual) to reserve a time slot to attend the Public Hearing.

***PUBLIC HEARING***

**Tuesday, December 1, 2020, 5p.m.–8 p.m.**

DoubleTree Suites – Tucson International Airport  
Ballroom Royale  
7051 South Tucson Boulevard  
Tucson, AZ 85756

In addition, you can participate in the Virtual Public Engagement event either online or by phone. The Virtual Public Engagement event supplements the Public Hearing, and it provides another opportunity for you to give official, recorded comments on the Draft Tier 1 EIS. To participate in the Virtual Public Engagement event, click on the online access link or call the phone access number provided below.

***VIRTUAL PUBLIC ENGAGEMENT EVENT***

**Thursday, December 3, 2020, 5p.m. – 8p.m.**

– **Online Access:** [bit.ly/SCEIS2020](https://bit.ly/SCEIS2020) (or you can use the full [Webex link](#))

- Meeting Number (Access code): 146 242 8979
- Event Password: SCEIS2020

– **Phone Access:** 1 (408) 418-9388

- Meeting Number (Access code): 146 242 8979

Because future, individual Tier 2 projects have the potential to adversely affect historic properties, FHWA and ADOT are developing a Tier 1-level programmatic agreement. On July 24, 2020, FHWA and ADOT distributed a draft programmatic agreement to all consulting parties (Petty [FHWA] to Jacobs [SHPO] et al., July 24, 2020). Responses were received from ASM, BIA, FAA, GRIC, Pima County, SHPO, and TAA. Comments have been addressed, and substantive changes are synopsized in Table 1 (see Enclosure). The revised agreement, entitled *Programmatic Agreement among Federal Highway Administration Arizona Department of Transportation Arizona State Historic Preservation Officer Regarding the Sonoran Corridor Project, Interstate 19 to Interstate 10, South of Tucson International Airport* (the PA), is enclosed here for your final review.

As part of the Section 106 public involvement, the draft PA was included in Appendix E of the Draft Tier 1 EIS. The final PA will be sent out for signatures once the public review and comment period on the Draft Tier 1 EIS has concluded. The final PA will be executed prior to issuance of the combined Final Tier 1 EIS / ROD document. Note that participating in the development or signing of the PA does not imply agreement with the future Final Tier 1 EIS / ROD document that will be issued by FHWA at the conclusion of this study.

Please review the enclosures and information provided in this letter. If you have any questions or concerns, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or e-mail [Tremaine.Wilson@dot.gov](mailto:Tremaine.Wilson@dot.gov); or Will Russell, ADOT Cultural Resources Program, by phone at (602) 712-6233 or by email at [WRussell3@azdot.gov](mailto:WRussell3@azdot.gov). If you have no further comment regarding the PA, please advise as to whether you intend to sign.

Sincerely,

Karla S. Petty  
Division Administrator

TREMAINE  
LUMUSS WILSON

Digitally signed by TREMAINE  
LUMUSS WILSON  
Date: 2020.11.19 16:19:15 -07'00'

By: Tremaine L. Wilson  
Civil Rights/Realty Specialist

\_\_\_\_\_  
Signature for SHPO Concurrence  
410-A(BFI)

\_\_\_\_\_  
Date

☐ Intend to sign the PA

☐ Do not intend to sign the PA

Enclosures

ecc:

Dr. David Jacobs, Compliance Specialist, SHPO, [DJacobs@azstateparks.gov](mailto:DJacobs@azstateparks.gov) (w/enclosures)

TWilson

WRussell



# Sonoran Corridor Tier 1 Environmental Impact Statement

## FEIS Appendix D – Agency Notification and Comments On the draft Tier 1 EIS



### SONORAN CORRIDOR DRAFT TIER 1 ENVIRONMENTAL IMPACT STATEMENT PROVIDE YOUR INPUT!

#### PROJECT DESCRIPTION

A Draft Tier 1 Environmental Impact Statement (EIS) has been prepared in accordance with the National Environmental Policy Act by the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT). The Draft Tier 1 EIS includes a comparative analysis of the No-Build and three corridor alternatives. After considering technical analyses and stakeholder and public input, FHWA and ADOT have identified a Preferred Corridor Alternative and would like your input now.

#### DRAFT TIER 1 EIS AVAILABLE FOR PUBLIC REVIEW AND COMMENT

On Nov. 6, 2020, FHWA and ADOT released the Draft Tier 1 EIS for the Sonoran Corridor study for public review and comment. The Draft Tier 1 EIS can be viewed on the ADOT website through the completion of the study at: [www.azdot.gov/sonorancorridor](http://www.azdot.gov/sonorancorridor).

#### ATTEND THE PUBLIC HEARING IN PERSON OR THE VIRTUAL PUBLIC ENGAGEMENT EVENT ONLINE OR BY PHONE

A Public Hearing on the Draft Tier 1 EIS will provide information on the Preferred Corridor Alternative and accept formal three-minute comments from the public given verbally to a court reporter and a panel of study team members. Because of public health concerns and government requirements, attendance will be limited to provide for adequate social distancing. Participants must pre-register to reserve time to attend the in-person Public Hearing. **Please sign up at <https://tinyurl.com/SonCor>, or call 520.327.6077 (bilingual) to reserve a 30-minute slot** during the Public Hearing within which a verbal comment of no longer than three minutes can be provided.

#### PUBLIC HEARING

**Tuesday, Dec. 1, 2020, 5 p.m. – 8 p.m.**

Doubletree Suites – Tucson Airport – Ballroom Royale, 7051 S. Tucson Blvd., Tucson, AZ 85756

**Presentation:** Repeats continuously for viewing at any time.

**Public Comments:** Reserve time to provide comment no longer than three minutes.

Join the hearing during the time you reserved.

In addition, the public also can participate through a Virtual Public Engagement event. The Virtual Public Engagement event supplements the Public Hearing and provides another opportunity for the public to give official, recorded comments on the Draft Tier 1 EIS either online or over the phone. To participate in the Virtual Public Engagement event, just follow the link or call the phone number at the scheduled date and time provided below.

#### VIRTUAL PUBLIC ENGAGEMENT EVENT

**Thursday, Dec. 3, 2020, 5 p.m. – 8 p.m.**

To attend, join by phone by calling 408.418.9388 and entering the meeting number (access code) 146 242 8979 or join online at [bit.ly/SCEIS2020](https://bit.ly/SCEIS2020) meeting number (access code) 146 242 8979 and password SCEIS2020.

**For Spanish (call-in only), call 408.418.9388 and enter meeting number (access code): 146 978 0659.** You will have the opportunity to make a comment to the panel that is recorded by the court reporter.

Join at any time. You will be able to listen to others' comments about the Draft Tier 1 EIS.

#### REVIEW THE DRAFT TIER 1 EIS DOCUMENT

The Draft Tier 1 EIS is available for review on the study website at: [www.azdot.gov/sonorancorridor](http://www.azdot.gov/sonorancorridor). Hard copies and/or electronic copies of the Draft Tier 1 EIS also are available at the following repository locations:

**ADOT Southcentral District Office**, 1221 S. Second Ave., Tucson, AZ 85713, 520.235.3494

*By appointment only between 9 a.m. and 4 p.m. weekdays. You must call at least 48 hours in advance.*

**Sahuarita Town Hall, Clerk's Office**, 375 W. Sahuarita Center Way, Sahuarita, AZ 85629, 520.822.8801

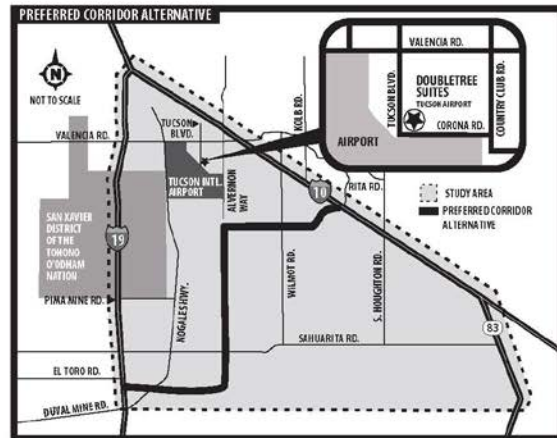
*Between 8 a.m. and 5 p.m. weekdays.*

**Joel D. Valdez Main Library**, 101 N. Stone Ave., Tucson, AZ 85701, 520.791.4010

**Joyner-Green Valley Library**, 601 N. La Cañada Dr., Green Valley, AZ 85614, 520.594.5295

Copies are available for purchase, delivery or pick up at The UPS Store, 2004 E. Irvington Road, Tucson, AZ 85714, 520.889.0077. Contact the store for cost and details.

Please contact repository sites in advance for details about required safety precautions.



#### SUBMIT YOUR COMMENTS ON THE DRAFT TIER 1 EIS DURING THE PUBLIC COMMENT PERIOD

Comments on the Draft Tier 1 EIS will be accepted during the public review and comment period from Nov. 6, 2020, to Jan. 8, 2021.

Study-related questions will not be answered during the Public Hearing or Virtual Public Engagement event. Instead, all comments and questions will be responded to by the project team in a combined Final Tier 1 EIS/Record of Decision (ROD) document anticipated to be released summer 2021. Questions about the study should be submitted during the formal public comment period through the options listed below.

Your comments submitted through one of the following options will be considered equal and part of the study record:

- At the Public Hearing or the Virtual Public Engagement event
- Online: [www.azdot.gov/sonorancorridor](http://www.azdot.gov/sonorancorridor)
- Phone: 855.712.8530 (bilingual)
- Email: [sonorancorridor@azdot.gov](mailto:sonorancorridor@azdot.gov)
- USPS Mail: ADOT Communications, c/o Joanna Bradley, 1221 S. Second Ave., Tucson, AZ 85713

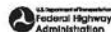
Pursuant to Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA) and other nondiscrimination laws and authorities, ADOT does not discriminate on the basis of race, color, national origin, sex, age or disability. Persons who require a reasonable accommodation based on language or disability should contact Joanna Bradley at 520.235.3494 or [jbradley@azdot.gov](mailto:jbradley@azdot.gov). Requests should be made as early as possible to ensure the State of Arizona has an opportunity to address the accommodation.

De acuerdo con el Título VI de la Ley de Derechos Civiles de 1964, la Ley de Estadounidenses con Discapacidades (ADA por sus siglas en inglés) y otras normas y leyes antidiscriminatorias, el Departamento de Transporte de Arizona (ADOT) no discrimina por motivos de raza, color, origen nacional, sexo, edad o discapacidad. Las personas que requieran asistencia (dentro de lo razonable) ya sea por el idioma o discapacidad deben ponerse en contacto con Teresa Finch a 520.327.6077 Ext. 111 o [teresa@fordleygroup.com](mailto:teresa@fordleygroup.com). Las solicitudes deben hacerse lo más antes posible para asegurar que el Estado de Arizona tenga la oportunidad de hacer los arreglos necesarios.

#### FOR MORE INFORMATION:

855.712.8530, [azdot.gov/sonorancorridor](http://azdot.gov/sonorancorridor), [sonorancorridor@azdot.gov](mailto:sonorancorridor@azdot.gov)

Project No. P9101 01P | Federal Aid No. 410-A(BFI)



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## AGENCY COMMENT LETTERS

Agency comment letters on the Draft Tier 1 EIS received throughout the comment period from November 6, 2020 to January 8, 2021 are shown on subsequent pages. Comments were received from cooperating agencies U.S. Environmental Protection Agency, U.S. Bureau of Reclamation, and the Arizona Game and Fish Department; as well as participating agencies U.S. Department of Interior (for both the National Parks Service and the U.S. Fish & Wildlife Service), the Tohono O’odham Nation, the Arizona State Land Department, City of Tucson, Pima County, and Santa Cruz County. The Tucson Airport Authority and Tucson Electric Power also submitted comment letters. Additionally, a resolution was received from the San Xavier District Allottee Association dated March 11, 2021.

- Comment Letter from U.S. Environmental Protection Agency
- Comment Letter from U.S. Bureau of Reclamation
- Comment Letter from Arizona Game and Fish Department
- Comment Letter from the Tohono O’odham Nation
- Comment Letter from U.S. Department of the Interior - National Park Service
- Comment Letter from U.S. Fish and Wildlife Service) with 2 attachments
- Comment Letter from Arizona State Land Department
- Comment Letter from Pima County
- Comment Letter from City of Tucson
- Comment Letter from Tucson Airport Authority
- Comment Letter from Tucson Electric Power
- Comment Letter from Santa Cruz County
- Resolution from San Xavier District Allottee Association

ADOT’s responses to each agency comment letter are shown in Appendix E. The Errata section of the Final Tier 1 EIS shows all substantive changes made to the EIS in response to agency and stakeholder comments.



# U.S. Environmental Protection Agency



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

January 7, 2021

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

John S. Halikowski  
Director  
Arizona Department of Transportation  
206 South 17th Avenue, MD 100A  
Phoenix, Arizona 85007

Subject: Draft Tier 1 Environmental Impact Statement for the Sonoran Corridor Study, Pima County, Arizona (EIS No. 20200219)

Dear Division Administrator Petty and Director Halikowski:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) aim to identify a high-capacity, access-controlled transportation corridor south of the Tucson International Airport that will provide a system linkage for regional, interstate, and international mobility needs in the study area. This document evaluates three corridor alternatives and the No-Build Alternative, with Alternative 7 identified as the Preferred Alternative. Alternative 7 travels east from I-19 south of El Toro Road, turns north along Alvernon Way, and then east along Old Vail Connection Road to its terminus on I-10 at Rita Road.

The EPA has appreciated the commitment of FHWA and ADOT to work closely with state and federal resource and regulatory agencies to provide a robust programmatic analysis, address agency concerns early, and avoid and minimize impacts to environmental resources. Through a collaborative approach of monthly agency meetings and early reviews, the EPA has had the opportunity to provide feedback and have our comments addressed throughout development of the Draft Tier 1 EIS, including revisions made to the environmental document in response to our comments on the Administrative Draft Tier 1 EIS. This extensive early coordination has resulted in efficiencies in the environmental review process and the identification and resolution of many concerns previously raised by the EPA. We are particularly encouraged by the robust discussion included in the document regarding the important hydrologic and biogeochemical role of ephemeral streams in arid/semi-arid ecosystems, and we look forward to working with ADOT to avoid and minimize impacts to these resources to the greatest extent possible as project design progresses in future Tier 2 studies. We also appreciate ADOT's commitments to work cooperatively with agencies and stakeholders in the study area to coordinate wildlife connectivity, local land use planning, and context-sensitive design for the Sonoran Corridor to minimize regional impacts from the project.

# U.S. Environmental Protection Agency

The EPA has no further comments on the Draft Tier 1 EIS. We look forward to continued collaboration with your agencies as we strive to further avoid and minimize impacts to resources of concern. When the Final Tier 1 EIS for this project section is available for review, please provide a copy to Clifton Meek, the lead reviewer for this project, at the same time the Final Tier 1 EIS is formally filed online. Mr. Meek can be reached by phone at 415-972-3370 or by email at [meek.clifton@epa.gov](mailto:meek.clifton@epa.gov).

Sincerely,

CONNELL  
DUNNING

Digitally signed by  
CONNELL DUNNING  
Date: 2021.01.07  
08:37:38 -08'00'

For Jean Prijatel  
Manager, Environmental Review Branch

Cc via email:  
Tremaine Wilson, Federal Highway Administration  
Carlos Lopez, Arizona Department of Transportation

# U.S. Bureau of Reclamation



IN REPLY REFER TO:  
PXAO-1500  
2.1.4.17

## United States Department of the Interior

BUREAU OF RECLAMATION  
Phoenix Area Office  
6150 West Thunderbird Road  
Glendale, AZ 85306-4001



VIA ELECTRONIC MAIL ONLY

Sonoran Corridor Tier 1 EIS Study Team  
Attn: Ms. Joanna Bradley  
Arizona Department of Transportation Communications  
1221 South Second Avenue, MD T100  
Tucson, AZ 85713

Subject: Sonoran Corridor Tier 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) Sonoran Corridor Tier 1 Draft EIS that was published in the Federal Register on November 6, 2020. The following comments are provided for your consideration.

On page 3-17, line 6-8: The summary provided conflates multiple Reclamation projects. We recommend rephrasing this sentence to read: "This land is undeveloped but a portion of it has been identified in one of the alternatives presented in the Bureau of Reclamation's Appraisal Study for a San Xavier CAP Reliability project."

On page 3-200, line 11-25 and Table 3-52, thru 3-201: Based on Figure 3-41 and without any qualifying statements (either in the text, table, or map), it is unclear if the San Xavier District well data has been included in this analysis. If the San Xavier District's well data was considered and incorporated in Table 3-52 but excluded from Figure 3-41 due to privacy considerations, we recommend including a qualifying statement on the map.

On page 3-214, line 31-39: The summary provided combines Reclamation and San Xavier District projects. We recommend rephrasing the statement under the Reclamation heading and adding a new subheading for the San Xavier District. Below is the suggested text for those subheadings:

Bureau of Reclamation – A water delivery and distribution system, referred to as the CAP Link Pipeline, along with an irrigation system for the San Xavier District Cooperative Farm, which begins at the terminus of the CAP Link Pipeline. These facilities were constructed for the San Xavier District in accordance with Public Law 97-293, the Southern Arizona

### INTERIOR REGION 8 • LOWER COLORADO BASIN

ARIZONA, CALIFORNIA\*, NEVADA\*

\* PARTIAL



# U.S. Bureau of Reclamation

*Sonoran Corridor Tier One EIS Scoping Comments*

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Water Rights Settlement Act (SAWRSA) of 1982, as amended and restated in Public Law 108-451, the Arizona Water Settlement Act (AWSA) of 2004. Future Reclamation projects (see Table 3-58) would need to be considered in Tier 2 if the Selected Alternative is Alternative 1.

San Xavier District – Several groundwater wells.

Pursuant to Reclamation's obligations from the SAWRSA and AWSA, we have an interest in ensuring that the Sonoran Corridor does not impact our ability to implement the Indian water rights settlement. We would therefore request that FHWA and ADOT continue to consider Reclamation's obligations should Alternative 1 be the selected Tier 1 corridor alternative. Furthermore, we would ask that you continue to coordinate with the Central Arizona Water Conservation District regarding potential impacts to their Pima Mine Road Recharge Project should Alternative 1 be the selected alternative.

Should you have questions, please contact Ms. Nichole Olsker, Environmental Protection Specialist, at (480) 216-9914, or via email at [nolsker@usbr.gov](mailto:nolsker@usbr.gov).

Sincerely,

SEAN  
HEATH

Digitally signed by SEAN  
HEATH  
Date: 2021.01.08  
14:26:33 -07'00'

Sean M. Heath  
Manager, Environmental Resource  
Management Division

cc: Ms. Velma Begay  
SAWRSA Project Office  
San Xavier District  
2018 West San Xavier Road  
Tucson, AZ 85746

Honorable Austin G. Nunez  
Chairman  
Tohono O'odham Tribal Council  
P.O. Box 837  
Sells, AZ 85634

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

# Arizona Game and Fish Department



January 4, 2021

Sonoran Corridor Tier 1 EIS Study Team  
% Joanna Bradley  
1221 S. Second Avenue, MD T100  
Tucson, AZ 85713

Submitted via email to [Projects@azdot.gov](mailto:Projects@azdot.gov)

**Re: Sonoran Corridor Tier 1 Draft EIS**

Dear Study Team:

The Arizona Game and Fish Department (Department) has reviewed the Federal Highway Administration (FHWA)/Arizona Department of Transportation's (ADOT's) Draft Tier I Environmental Impact Statement (DEIS) for the Sonoran Corridor, linking Interstates 10 and 19 (east and south of Tucson). As a Cooperating Agency, the Department provided written comments regarding the Administrative Draft Tier 1 EIS on August 14, 2020.

The Department appreciates the coordination and collaboration shown to cooperating agencies throughout the planning and design of this project to date. Nearly all the comments and recommendations provided in the Department's August 14, 2020 comment letter have been incorporated into the DEIS. These include designing drainage structures that would minimize impacts to wash channel geometry to avoid hydrologic function alteration, incorporating bat roosting sites into the design of any new bridges, and native plant salvage with possibly native seed collection prior to vegetation removal. ADOT has also committed to long-term invasive species management efforts within the Sonoran Corridor.

Recognizing that specific mitigation measures cannot be developed at this stage of the Sonoran Corridor Study, the Department appreciates the inclusion in the DEIS of general mitigation strategies that will be further refined during the Tier 2 process. To further conservation for all species, the Department requests ADOT include reptile surveys in the Final Tier 1 EIS discussion of available mitigation measures for species-specific surveys to be conducted during the Tier 2 process. These surveys will help determine if any specific design considerations are needed to lessen impacts to rare and sensitive reptile species, as well as improve safety for motorists that will use the road.

As mentioned in our previous comments to the Study Team, the Department has considerable in-house expertise in monitoring wildlife movement and assisting with development of wildlife crossing structures. The Department has a long, successful working relationship with ADOT in this field and remains available and committed to future collaborative efforts to conserve and

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[azgfd.gov](http://azgfd.gov) | 520.628.5376

TUCSON OFFICE: 555 N. GREASEWOOD ROAD, TUCSON AZ 85745

GOVERNOR: DOUGLAS A. DUCEY COMMISSIONERS: CHAIRMAN, ERIC S. SPARKS, TUCSON | KURT R. DAVIS, PHOENIX  
LELAND S. "BILL" BRAKE, ELGIN | JAMES E. COUGHNOUR, PAYSON | JAMES S. ZIELER, ST. JOHNS DIRECTOR: TY E. GRAY DEPUTY DIRECTOR: TOM P. FINLEY

# Arizona Game and Fish Department

*AZGFD Comments on the Sonoran Corridor Tier 1 Draft EIS*

January 4, 2021

Page 2

enhance wildlife movement corridors. The Department appreciates the inclusion of statements in the DEIS regarding ADOT's commitment towards further coordination with the Department during the Tier 2 NEPA process.

The Department understands the need to balance a wide range of environmental concerns and competing priorities when selecting the preferred alternative. Our trust responsibility to the citizens of Arizona for the management of their wildlife requires that the Department support, whenever possible, an alternative that represents the least negative impact to wildlife and their habitat. Therefore, the Department maintains its position that Corridor Alternative 1 represents the best overall option for Arizona's wildlife, primarily because it would have the least effect on wildlife connectivity of the three alternatives presented. To summarize, of the three alternatives proposed in the DEIS, the Department considers Corridor Alternative 1 preferable over Corridor Alternative 7, and both preferable over Corridor Alternative 8A, which would impact the greatest amount of wildlife movement areas in the study area.

The Department appreciates the opportunity to continue as a cooperating agency on the Sonoran Corridor Study and to provide comments on the Draft EIS. Please contact Kristin Terpening at [kterpening@azgfd.gov](mailto:kterpening@azgfd.gov) or 520-388-4447 if there are any questions or concerns regarding this letter.

Sincerely,



Raul Vega  
Supervisor, Tucson Region

AGFD # M20-11093206

# Tohono O'odham Nation

Leadership with Loyalty, Integrity & Wisdom



Tohono O'odham Nation  
Office of the  
Chairman and Vice Chairwoman

Ned Norris Jr. Wavalene M. Saunders  
Chairman Vice Chairwoman



January 8, 2021

Sonoran Corridor Tier 1 EIS Study Team  
c/o Joanna Bradley  
1221 South Second Avenue, MD T100  
Tucson, AZ 85713

## RE: Draft Sonoran Corridor Tier 1 Environmental Impact Statement

Dear Ms. Bradley and the Sonoran Corridor Tier 1 EIS Study Team:

The Tohono O'odham Nation appreciates the opportunity to comment on the Sonoran Corridor Tier 1 Draft Environmental Impact Statement. We are most appreciative of the efforts to address the various environmental aspects of the corridor, especially the potential impact on sensitive cultural areas on the Tohono O'odham Nation's San Xavier District. We are also appreciative of the multiple consultation opportunities afforded the Tohono O'odham Nation, the San Xavier District, and our members that hold allotments that could potentially be impacted by construction of the Corridor.

There are a number of factors that influence our comments. We first recognize the response to the survey of Allottees that would be directly impacted by the suggested route that was included in your review process. In addition, avoidance of culturally sensitive areas must be a priority in any discussion, and planning that minimizes the impact of the transportation corridor on our people and land is critical.

That said, the Nation believes further analysis of Alternative 1 as this process moves forward would be prudent. This was the highest rated Alternative and, most importantly, would allow for the consideration of options that might not have been considered in the initial review process.

While we understand the need to complete this Tier 1 study now, we request that Alternative 1 be retained as an Alternate Route for future joint analysis in addition to the recommended Alternative 7. This is an important project and has the potential to provide a significant benefit to the entire region. We encourage you to retain Alternative 1 in the planning process.

Sincerely,

Chairman Ned Norris, Jr.  
Tohono O'odham Nation

P O B o x 8 3 7 S e l l s , A Z 8 5 6 3 4 - 5 2 0 . 3 8 3 . 2 0 2 8



# U.S. Department of the Interior



## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
2800 Cottage Way, Rm E-1712  
Sacramento, California, 95825

In Reply Refer To:  
20/0470

*Filed Electronically*

January 8<sup>th</sup>, 2021

Ms. Karla S. Petty  
Division Administrator  
Federal Highways Administration  
Arizona Division  
4000 N Central Ave

Subject: Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation for the Sonoran Corridor between Interstate 10 and Interstate 19, Pima County, Arizona, dated October, 2020.

Dear Ms. Petty:

Thank you for the opportunity to review the *Sonoran Corridor Study Draft Tier 1 Environmental Impact Statement (DEIS)*, dated October, 2020 and the Preliminary Section 4(f) Evaluation included in the DEIS. The Department of the Interior (Department) provides the following comments on behalf of the U.S. Fish and Wildlife Service (FWS) and the U.S. National Park Service (NPS).

### **NPS Section 4(f) Comments**

Congress established the Juan Bautista de Anza National Historic Trail under the National Trails System Act ([NTSA], 16 USC 1241 et. seq.) in 1990. NPS formalized the Anza National Historic Trail (NHT) Comprehensive Management and Use Plan (CMUP) in 1996 to establish the federal framework for all further development and management of the 1,200-mile trail corridor. Pima County included the establishment of the Anza Trail in its 1997 Historic Preservation bond program, and a segment of the Anza Trail was identified as an element of the Eastern Pima County Trail System Master Plan in 1998. Since 2000, NPS and Pima County have promoted establishment of easements, rights-of-way, interpretive signage, and other improvements to 47 consecutive miles of trail.

The NPS has agreed to be a consulting party for the Tier 1 Programmatic Agreement under Section 106 of the National Historic Preservation Act (NHPA). The Anza Expeditions represent a vital portion of early Spanish colonial history in America, and the Anza Trail Historic Corridor and Recreational Retracement Route provide a direct link to the past. Therefore, the Department requests that the Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) describe and analyze impacts to all relevant elements of the Anza Trail, Recreational Retracement Route, and Historic Corridor in the project Study Area that could be affected by the alternatives, including two historic expedition campsites within the Study Area

# U.S. Department of the Interior

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managed by Anza NHT (Punta de los Llanos trailhead and Campsite number 17 located near Mission San Javier del Bac on the lands of the Tohono O'odham Nation).

Please continue to consult with the Arizona State Historic Preservation Officer (SHPO) to ensure that any adverse effects to the Historic Trail Corridor and Recreation Retracement Route are avoided, minimized, or mitigated to ensure the period of significance and integrity is retained for as much of the trail as possible, and ensure that the 4(f) analysis of use of historic properties in the Study Area specifically considers any cultural resources within the Anza NHT and the boundaries of the Historic Corridor and Recreational Retracement Route.

## **FWS Comments**

The U.S. Fish and Wildlife Service (FWS) has reviewed the October 2020 *Sonoran Corridor Study Draft Tier 1 Environmental Impact Statement* (Project No. P9101 01P, Federal Aid No. 410-A(BFI)). FWS comments conform to policy outlined in the *U.S. Fish and Wildlife Service Manual*, Section 505, FW 3-4, concerning review of environmental documents.

FWS provides this summary as a companion document to the attached comments matrix in which FWS reviewed the contents of Chapter 3, Section 3.13 (*Biological Resources*) and four subsections, as identified in comment 1 of the matrix. Some of FWS comments in the matrix are brief, bulleted statements of the DEIS's contents. FWS included comments of this type to provide reviewers a broad overview of the proposed action and for quick reference. Comments in the matrix focus on Section 3.13.2, *Threatened and Endangered Species*; however, FWS also touches on the study area's biological characteristics, other special status species, and wildlife connectivity.

The DEIS considers and contrasts three corridor alternatives in detail: Alternatives 1, 7, and 8A. FWS provides distinguishing features of the three alternatives in the matrix in comments 2, 3, 13-15, and 17. Alternative 7 is ADOT's preferred alternative. In the Conclusions section of this summary, FWS identifies the alternative that will likely have the fewest impacts on biological resources in the Sonoran Corridor study area.

## **FWS General Comments**

The FWS finds that the project proponents, the Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT), have properly identified affected wildlife and other biological resources within the Sonoran Corridor Study Area (hereafter SCSA) and, for the most part, have adequately addressed potential impacts of the proposed action on those resources from a Tier 1 perspective. Mitigation measures are also adequate for Tier 1-level-purposes for the most part, which is to compare action corridor alternatives and select one that best meets the purpose and need of the proposed action while also minimizing impacts to human and natural environments. FWS's primary concern is that potential impacts to endangered and special status plant species have not been adequately addressed in the DEIS. Specifically, FWS is concerned about potential impacts to the endangered Pima pineapple cactus (*Coryphantha scheeri* var. *robustispina*) (PPC) and Tumamoc globeberry (*Tumamoca macdougalii*), a species FWS listed as endangered in 1986, delisted in 1993, and is declining once again in parts of its range. FWS also has concerns about the Sonoran desert tortoise (*Gopherus morafkai*) (SDT), a candidate species; however, the DEIS lists an impressive number of planned mitigation measures for SDT, and

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# U.S. Department of the Interior

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FWS will have no more to say about the species beyond what is in the matrix (see comments 11, 17, and 18).

## *FWS Specific Comments*

### Pima Pineapple Cactus

FWS emphasizes the following key points from the extensive comments in the matrix (comment 13):

- The PPC will almost certainly be impacted at levels well above any other listed or candidate species that occurs in the study area.
- In the final EIS, ADOT will need to clarify the schedules for PPC surveys and for developing a comprehensive mitigation program for the species. In one section of the DEIS, ADOT indicates these actions will occur *before* Tier 2. In another section, the DEIS indicates the actions will occur *during* Tier 2. We recommend that PPC field studies begin at the earliest possible date to assure adequate time to assess potential impacts on the species and the feasibility of mitigating for potentially significant losses.
- Mitigation and compensation for PPC losses will be possible only if losses do not involve a substantial proportion of the remaining PPC population, which is probably under 8,000 individuals, and to the extent that PPC conservation bank credits or mitigation lands are available for purchase.
- If impacts to the PPC within the preferred alternative cannot be effectively mitigated, ADOT will need to choose among other corridor alternatives and options where PPC numbers are lower.
- FWS recommends that all options for aligning the Sonoran Corridor Project through Pima County remain open until the potential effects of the preferred alternative on the PPC are well understood.

### Tumamoc Globeberry

ADOT planners are aware that this species occurs in Pima County and that it has declined in the county in recent years. Yet it is mentioned only in passing in the DEIS. There is no clear commitment in the DEIS that surveys for the plant will occur and no specific mitigation measures are proposed. We request that ADOT include additional details about its intentions with regard to the globeberry in the final EIS.

### Other Special Status Species and Managed Lands for Wildlife

The DEIS states in general terms that ADOT will work with federal, state, and local agencies during Tier 2 to evaluate potential impacts to the habitats of all special status species and to avoid or minimize those effects. We encourage Sonoran Corridor planners to apply the same due diligence to all lands managed for wildlife values that may lie in or near the path of the future Sonoran Corridor. We also encourage planners to coordinate with government agencies and private organizations that are signatories to FWS habitat conservation plans (HCPs), e.g., the City of Tucson HCP, and multi-species conservation plans (MSCPs) such as the Pima County MSCP.

### The Preferred Alternative: Corridor Alternative 7

The primary purpose of Tier 1 is to compare differences among 2,000-foot-wide build corridor alternatives and identify one, the Preferred Alternative, to advance to Tier 2 for further NEPA

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analysis, including site- and species-specific on-the-ground studies that will allow planners to refine the 2,000-foot-wide study corridor down to a 400-foot-wide right-of-way.

Sonoran Corridor planners have chosen Corridor Alternative 7 as the Preferred Alternative. Alternative 7 has the apparent advantage of having fewer potential impacts to biological resources overall than Alternative 8A, but it is likely to adversely affect more sensitive resources than Alternative 1. Alternative 7 is intermediate in its total length and area (see comment 2 in the matrix), and for its potential effects to PPC and SDT habitat. It is also intermediate in the proportion of wildlife movements corridors likely to be affected (51%), but it would cause the most habitat fragmentation and will affect the most xeroriparian habitat. In addition, the status of *T. macdougallii*, the Tumamoc globeberry, within the corridor alternative is entirely unknown.

### Corridor Alternative 1

In contrast to Corridor Alternative 7, Alternative 1 will have the smallest construction footprint (length and area), the least amount of xeroriparian and potential PPC habitat, and will cause the least amount of habitat fragmentation. The percent of alternative 1 that lies within identified wildlife movement corridors at 29%, is significantly smaller than the other two alternatives. On the other hand, Alternative 1 has the most potential Sonoran desert tortoise habitat of any alternative, and as with Alternative 7 (and 8A, for that matter), the globeberry is an unknown quantity.

### *FWS Conclusions*

- From a Tier 1 perspective, Corridor Alternative 1 would have the lowest apparent overall impact to biological resources among the alternatives considered in the Sonoran Corridor DEIS. FWS may have chosen this alternative as the Preferred Alternative had the decision been its to make.
- However, the parameters ADOT used to contrast the three alternatives included no data from field surveys; thus, FWS could not differentiate definitively between corridor alternatives with respect to their impacts on listed wildlife and special status plant species.
- One risk of a tiered NEPA process is that a recommended or preferred corridor alternative will advance to Tier 2 based on inadequate data. FWS concludes that this is not the case for most species and biological resources considered in the DEIS. Overall, FWS is satisfied that no surprises where those species and resources are concerned are likely to occur—even as FWS acknowledges that specific mitigation strategies must await preconstruction and species-specific protocol surveys during Tier 2.
- In the case of the Pima pineapple cactus, Tumamoc globeberry, and Sonoran desert tortoise, however, ADOT's Tier 1-level analysis likely has not provided the level of detail needed to fully inform selection of a Preferred Alternative. All three species are widespread in the study area and may occur in each of the corridor alternatives.
- The globeberry and SDT are unlikely to occur in large numbers in any of the corridor alternatives, and the number of affected individuals is unlikely to represent a substantial proportion of each species' remaining range-wide population. Measures to avoid, minimize, and mitigate project effects to these species are likely to be effective in avoiding ESA prohibitions against jeopardy—should either species be listed before the Sonoran Corridor is built.
- In contrast to the globeberry and SDT, the PPC is listed as endangered, is restricted in its



range and total population, and may occur in large numbers in all three build corridor alternatives. In the absence of occurrence data including numbers and distribution, based on thorough field surveys, in all corridor alternatives, there is no reason at this time to conclude that an effective strategy to offset PPC losses resulting from the proposed action is possible.

## **NPS Comments**

### ***Juan Bautista De Anza National Historic Trail***

As all alternatives proposed in the DEIS would result in impacts to the Anza NHT Recreational Retracement Route defined in the Anza CMUP, NPS would like to collaborate with FHWA and ADOT to ensure all alternatives in the Final EIS, including the preferred alternative, promote safe and accessible passage for pedestrians, bicyclists, and equestrians (through collaboration with the Pima County Office of Sustainability, the City of Tucson, Farmers Investment Company (FICO), the Anza Trail Coalition of Arizona, and other community groups). We request FHWA identify and analyze potential proposed actions, issues, and impacts related to visitor use of the Anza Trail Historic Corridor and Anza Trail Recreational Retracement Route.

Using updated geospatial data from NPS and Pima County, FHWA may accurately demarcate where the existing and planned trail segments of the Anza Trail, Anza Trail Historic Corridor, and Anza Trail Recreational Retracement Route (mandated for protection in the CMUP) occur within the Study Area, including consideration of limitations to or expansion of recreational opportunities, recreational safety and crossings, and increased disruption to natural sounds, night skies, and air quality. By providing a Viewshed Impact Analysis (VIA) in the Final EIS, FHWA may address interpretive value and threats to integrity of the Anza NHT within the Study Area. The Land Management and Special Designated Lands section of the Tier I analysis requires updated geospatial data to include the Anza NHT designation in the Study Area.

Landscape features including viewsheds and natural components are critically important to the trail's historic integrity. Due to the importance of landscape as a contributing feature to the trail's significance, the NPS requests FHWA and ADOT include a native species restoration plan for any disturbances of Anza NHT within the riparian corridor of the Santa Cruz River, replanting disturbed areas with vegetation native to the Pimería Alta to ensure that the natural setting is preserved. Please collaborate with Anza NHT and other partners to ensure all alternatives in the Final EIS include, and ultimately implement, passive interpretive programming related to the trail to serve a growing region with increasing demand for outdoor recreation, interpretation, and education opportunities. We respectfully request FHWA retain the interpretive site of the Anza Trail at the Llano Grande Trailhead, and ensure that all trail rights-of-way and sections of historic corridor are maintained as natural or cultural landscapes.

### ***Saguaro National Park***

Saguaro National Park is a Class I area adjacent to the Sonoran Corridor Study Area and will be directly impacted by the FHWA's Interstate 11 Nogales to Wickenburg project (I-11 Project). Given the proximity of the two projects, we believe the Sonoran Corridor Tier 1 EIS affected environment should acknowledge the I-11 Project preferred alternative and trends in air quality that it could create, consistent with the 2020 Council on Environmental Quality NEPA

# U.S. Department of the Interior

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regulations (40 CFR 1502.15). Similarly, the Sonoran Corridor Tier 1 DEIS impacts analysis should acknowledge that nitrogen oxides, soot, volatile organic compounds, and ozone formation from such a large-scale transportation project can result in atmospheric deposition and affect visibility within Saguaro National Park. Due to this, the NPS requests FHWA and ADOT make the specific changes noted in the attached appendix, including a commitment to a quantitative analysis of air quality impacts at Saguaro National Park.

Because the Preferred Alternative in the Sonoran Corridor Tier 1 DEIS has potential to align and intersect with sections of the preferred alternative in the administrative draft of the I-11 Project final EIS, for which NPS is a cooperating agency under NEPA, NPS requests a meeting with FHWA and ADOT to gain a better understanding of the connectivity between these two projects, and the potential for increased traffic, utilities, and multimodal uses if both projects are built. Based on the results of that meeting, the NPS may have additional feedback regarding the analysis in the Sonoran Corridor Tier 1 DEIS.

## Conclusion

For additional Comments from FWS, please see **Attachment 1** – *Additional Comments from FWS on the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation for the Sonoran Corridor Between Interstate 10 and Interstate 19 in Pima County, AZ.*

For additional comments from NPS, please see **Attachment 2** – *Additional Comments from NPS on the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation for the Sonoran Corridor Between Interstate 10 and Interstate 19 in Pima County, AZ.*

Thank you for the opportunity to provide comments and a path forward to minimize impacts to the Juan Bautista de Anza National Historic Trail and the values for which the trail was established, impacts to Saguaro National Park and to our protected and sensitive wildlife resources. The Department and Bureaus are available to meet to clarify any of our comments or recommendations, and further assist the FHWA and ADOT with identification of appropriate measures for the benefit of these resources. For questions regarding FWS specific comments please contact Mr. Bob Lehman, the FWS Transportation Liaison at 602-889-5950 or via email at [Robert\\_lehman@fws.gov](mailto:Robert_lehman@fws.gov). For questions regarding NPS specific comments please contact Ms. Karen Skaar at 303-349-4160 or via email at [Karen\\_skaar@nps.gov](mailto:Karen_skaar@nps.gov). For all other questions please contact me at 415-420-0524 or via email at [Janet\\_whitlock@ios.doi.gov](mailto:Janet_whitlock@ios.doi.gov).

Sincerely,

JANET  
WHITLOCK

Digitally signed by  
JANETWHITLOCK  
Date: 2021.01.08  
15:27:57 -0800

Janet Whitlock  
Regional Environmental Officer

Attachments

Cc:

Shawn Alam, DOI

Karen Skaar, NPS

Robert Lehman, FWS

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U.S. Department of the Interior – Attachment 1 – Additional Comments from FWS on the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation for the Sonoran Corridor Between Interstate 10 and Interstate 19 in Pima County, AZ

#	Chapter/ Section	Page/ Table	Title/ Topic	Line(s)	Reviewer	Comments	Disposition
1	Chapter 2/ Chapter 3		Alternatives Considered/ Existing Conditions and Environmental Consequences		Lehman	<p>Below we provide comments on the following sections of Chapter 2 (Alternatives Considered) and Chapter 3 (Existing Conditions and Environmental Impacts):</p> <p style="text-align: right;"><u>Page #</u></p> <p>2.4-2.6 Screening and Comparing Alternatives ..... 2-12</p> <p>3.13 Biological Resources.....3-140</p> <p>3.13.1 Vegetation and Wildlife.....3-140</p> <p>3.13.2 Threatened and Endangered Species.....3-153</p> <p>3.13.3 Arizona Species of Greatest Conservation Need.....3-165</p> <p>3.13.4 Wildlife Connectivity.....3-176</p> <p>Our comments focus on threatened and endangered species. In some cases, e.g., Comment #2, we simply repeat short statements of fact from the DEIS. They are included here because we address them in our comments summary (a separate docx attachment) and wish to provide a reference for those facts. Comments #s 17 and 18, which summarize the project's potential impacts and list nearly verbatim mitigation measures from Section 3.13, are included primarily for quick reference.</p>	
2	Chapter 2, Section 2.4 to Section 2.6	2-12 to 2-36	Reasonable Alternatives Screened and Compared		Lehman	<p>There are 3 build corridor alternatives: 1, 7, and 8A. They are 16.0, 20.5, and 21.0 miles long, and encompass approximately 3,845, 5,155, and 5,285 acres, respectively.</p> <p>Corridor Alternative 7 is the Preferred Alternative.</p> <p>All 3 alternatives avoid the most densely populated sections of the study area in and near Tucson.</p> <p>Most lands in the study area are privately-owned or managed by the Arizona State Lands Department. Like private landowners, ASLD can sell or lease lands under its jurisdiction for municipal, industrial, or commercial development.</p> <p>In the Corridor Selection Report (CSR), the <i>environment</i> category constituted a generalized comparative measure of each corridor alternative's overall energy consumption (vehicle times, congestion, fuel consumption), its air quality effects, and effects on sensitive resources. Alternative 1 will have the least environmental impact (this is its performance in this category); Alternative 8A the most; and Alternative 7 will be intermediate in its effects.</p> <p>Overall scores for eight performance categories (economic benefits, meeting anticipated growth needs, feasibility, and environmental effects among them), for the 3 corridor alternatives were equal, i.e., all achieved the same balance across all categories in spite of higher or lower scores in individual categories (see Table 2-1, Page 2-13).</p>	



U.S. Department of the Interior – Attachment 1 – Additional Comments from FWS on the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation for the Sonoran Corridor Between Interstate 10 and Interstate 19 in Pima County, AZ

#	Chapter/ Section	Page/ Table	Title/ Topic	Line(s)	Reviewer	Comments	Disposition
3	Chapter 3, Section 3.13.1	3-140 to 3-152	Vegetation and Wildlife		Lehman	<p>Vegetative cover is predominantly undeveloped desertscrub with small amounts of semidesert grassland in the southern part of the study area. Xeroriparian vegetation (primarily mesquite) occurs along most drainages.</p> <p>All drainages in the study area, including the Santa Cruz River, are ephemeral.</p> <p>Other than livestock ponds and sand and gravel pits that have filled with water, there is no open water in the study area.</p> <p>Corridor Alternative 7 contains the largest amount of riparian (xeroriparian) habitat (218 ac).</p> <p>Corridor Alternative 1 contains desertscrub only (no semidesert grassland) and the least amount of xeroriparian habitat (166.8 ac). Alternative 1 would have the smallest impact to biotic communities.</p>	
4	Chapter 3, Section 3.13.2	3-153 to 3-165	Threatened and Endangered Species		Lehman	<p>Eight species appear on Table 3-41, ESA-Protected Species and Habitat, but three (jaguar, ocelot, Sonoran desert tortoise) did not appear on the IPAC printout for the project. We are not certain why they were not on the list, but commend ADOT for including them in the DEIS analysis. Below we present the habitat descriptions for each species from Table 3-41, ADOT's conclusions regarding the status of each these species in the DEIS, and indicate whether we concur or concur provisionally with those conclusions. Where appropriate we correct factual errors, identify factors that need additional consideration, expand the discussion, and provide helpful information.</p>	
5	T&E Species	Table 3-41	Jaguar		Lehman/ Alanen	<p>Associated with Madrean evergreen woodland and semidesert grassland biotic communities, usually in intermediately rugged to extremely rugged terrain with low human disturbance. Arizona records are from 3,400- 9,000 feet above sea level and within 6.2 miles of water. Five, possibly 6, individuals documented in southern Arizona since 1996.</p> <p><u>ADOT Conclusions:</u> The study area is generally flat and lacks rugged terrain. Known recent occurrences within Arizona have been primarily in the Sky Islands of southern Arizona, but jaguars occurred historically well north of the study area. Thus, the study area could be used as a movements corridor.</p> <p>Also from the DEIS: A habitat model for jaguar developed by the Wildlife Conservation Society for the USFWS and Jaguar Recovery Team predicts suitable habitat to the north and south of the study area but does not show suitable habitat within the study area.</p> <p><b>We concur.</b></p> <p>The following document will aid in the construction of wildlife crossings for jaguars:  <a href="#">Recommendations of Road Passage Designs for Jaguars.</a></p>	



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6	T&E Species	Table 3-41	Ocelot		Lehman	<p>In Arizona, most occurrences have been associated with desertscrub, dense thornscrub, and oak and pine-oak woodlands &lt;4,000 feet in elevation.</p> <p><u>ADOT Conclusions:</u> Desertscrub occurs within the study area and relatively recent detections have occurred north and south of the study area. Ocelots could use the study area as a movements corridor.</p> <p><b>We concur.</b></p> <p>However, we add the following to the habitat description above (from the recovery plan, page 24):</p> <p>Recent detections of three other ocelots in Arizona were located in the semidesert grassland (46%), Madrean evergreen woodland (46%), and Great Basin grassland (8%) biotic communities. On average, these locations were &lt;1.5 mile from perennial water, had 23% tree cover, and were &gt;3.5 miles from a major road. Elevation: on average was 5,500 feet amsl</p>	
7	T&E Species	Table 3-41	California Least Tern		Lehman	<p>Nests in colonies on sparsely vegetated beaches, sandbars, gravel pits, and exposed flats along shorelines of inland rivers, lakes, and reservoirs.</p> <p><u>ADOT Conclusions:</u> Gravel pits occur in Corridor Alternatives 1 and 7, but there are no beaches, sandbars, or shorelines in the study area. This species is unlikely to occur in the study area.</p>	
8	T&E Species	Table 3-41	Western Yellow-billed Cuckoo		Lehman/ Sferra	<p>Habitat is highly variable. Occurs in riparian, mesquite, or Madrean evergreen woodlands in perennial, intermittent, and ephemeral drainages, from dense contiguous patches of trees on wide floodplains to narrow stringers and small groves of scattered trees in more xeroriparian habitats. Canopy closure varies between and often within drainages. Elevation range is sea level to 7,000 feet.</p> <p><u>ADOT Conclusions:</u> Ephemeral drainages in the study area lack contiguous patches, stringers, and small groves of dense trees. Cuckoos are unlikely to occur in corridor alternatives.</p> <p><b>We concur, provisionally.</b></p> <p>Our understanding of cuckoo breeding habits and habitats is changing. We now know that cuckoos nest in mesquite bosques, the predominant vegetation type in xeroriparian habitats in the Sonoran Corridor study area, and in areas that would have surprised us 5 years ago. We strongly recommend that ADOT examine closely our revision of proposed cuckoo critical habitat (85 FR 11458), not because there may be critical habitat in the study area (there is not), but because the FR notice provides detailed descriptions of habitats where cuckoos may be found in the Southwest, focusing on xeroriparian habitats in Arizona. We also recommend that ADOT consider cuckoo protocol surveys during Tier 2 in selected drainages of the preferred alternative, e.g., on the Santa</p>	

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						Cruz River, to assure that cuckoos are not present. A recent update of our section 7 consultation guidance on cuckoos (USFWS 2020) also provides useful information on cuckoo life history and habitat use.	
10	T&E Species	Table 3-41	Northern Mexican Gartersnake		Lehman/ Servoss	<p>Occurs in lotic and lentic habitats with edges of dense emergent vegetation, including cienegas, ponds, stock tanks, and lower gradient rivers and streams with pools, protected backwaters, braided side channels, and beaver ponds. Terrestrial habitats used up to one mile from surface water. Adequate ground cover important; canopy cover less so. In Arizona, found at elevations from 3,000-5,000 feet, occasionally up to 6,500 feet.</p> <p><u>ADOT Conclusions:</u> A few ponds are present in Corridor Alternatives 1 and 7, but both lack dense emergent vegetation and [suitable] adjacent ground cover. This gartersnake is unlikely to occur in any of the corridor alternatives.</p> <p><b>We concur.</b></p> <p>For future reference on other projects involving this gartersnake, we recommend ADOT have the following documents on file:</p> <p>Servoss, J. 2019. Rangewide population status information for the northern Mexican gartersnake (<i>Thamnophis eques megalops</i>) through September 2019. Unpublished report dated September 25, 2018. U.S. Fish and Wildlife Service, Arizona Ecological Services Office, Tucson.</p> <p>Servoss, J. 2020. Status of the species [for the northern Mexican Gartersnake]. Unpublished report dated May 1, 2020. U.S. Fish and Wildlife Service, Arizona Ecological Services Office, Tucson.</p>	
11	T&E Species	Table 3-41	Sonoran Desert Tortoise (SDT)		Lehman	<p>Primarily occupies rocky slopes and bajadas in Sonoran and Mohave desertscrub. May disperse through and include intermountain valleys in their home ranges. Tortoises and tortoise sign reported up to one mile from bajadas, but tortoises probably occur in lower densities in flatter areas. Elevation range is from 900-4,200 feet.</p> <p><u>ADOT Conclusions:</u> The study area is located within the current range of the tortoise. All of the corridor alternatives would remove tortoise habitat. Tortoises could be injured or killed, e.g., due to vehicle strikes during construction and during normal operations after the freeway opens.</p> <p>Note these additional details from the DEIS:</p> <p>A review of the SDT Potential Habitat spatial modeling created by BLM, USFWS, USGS, and AGFD (USFWS 2015c) revealed that patches of high- and low-value potential habitat for SDT may be present throughout each corridor alternative (Figure 3-36). The data represented in this spatial modeling is designed to provide a landscape-scale depiction of the relationship between several different spatial data layers that are relevant to SDT habitat. No attempt is made to define or describe</p>	

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						<p>actual, on-the-ground SDT habitat through this modeling. Therefore, the quality of the habitat within the corridor alternatives may be greater than or less than what is reported in the spatial modeling.</p> <p>However, based on the SDT potential habitat modeling:</p> <p><u>Corridor Alternative 1 contains the largest amount of potential SDT habitat, with 85.0 acres of high-value habitat and 16.7 acres of low-value habitat for a total of 101.7 acres (Table 3-43). Corridor Alternative 8A contains the least amount with 20.9 acres of high value habitat and 53.0 acres of low value habitat for a total of 73.9 acres (our emphasis).</u></p> <p>Further habitat evaluation conducted during the Tier 2 analysis will further identify suitable habitat present at a smaller scale.</p> <p><b>We concur and encourage ADOT to conduct a full on-the-ground status assessment of the SDT and its habitat in the Selected Alternative during Tier 2.</b></p> <p>Also, note:</p> <p><u>After having removed the SDT from the threatened and endangered species candidate list (80 FR 60321), in compliance with a recent court order, we returned the tortoise to the candidate species list, and are currently conducting a new status assessment for the species.</u></p> <p>Also, ADOT is a signatory to a Candidate Conservation Agreement (CCA) for the tortoise, issued in May 2015. Pursuant to that agreement, ADOT has agreed to a number of conservation actions on behalf of the tortoise, as outlined on page 49 of the CCA. The CCA is available on our website: <a href="https://www.fws.gov/southwest/es/arizona/Sonoran_Tort.htm">https://www.fws.gov/southwest/es/arizona/Sonoran_Tort.htm</a></p>	
12	T&E Species	Table 3-41	Sonoyta Mud Turtle		Lehman	<p>Found in aquatic habitats with perennial or near perennial surface water, including streams and natural and human-made ponds, and in adjacent terrestrial habitat that maintains soil moisture. Elevation from sea level to 6,700 feet.</p> <p><u>ADOT Conclusions:</u> Ponds in Corridor Alternatives 1 and 7 lack natural elements to support the mud turtle. The species is unlikely to occur in the study area.</p> <p>• <b>We concur.</b></p>	
13	T&E Species	Table 3-41	Pima Pineapple Cactus (PPC)		Lehman/ Crawford	<p>The DEIS presents two descriptions of Pima pineapple cactus (<i>Coryphantha scheeri</i> var. <i>robustispina</i>) (PPC) habitat:</p> <p><u>In Table 3-41, Page 3-157:</u> Ridges in semidesert grassland and alluvial fans in Sonoran Desertscrub. Occurs on alluvial hillsides in rocky, sandy soils. Habitat type is primarily desert grassland at elevations of 2,300—5,000 feet.</p>	

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						<p><u>Also on Page 3-157, and Page 3-158:</u> Grows primarily in open areas within Sonoran Desertscrub and Desert Grassland biotic communities but otherwise has fairly general habitat requirements and occurs across multiple soil types. PPC may occur within all corridor alternatives in areas that are undisturbed and mostly open, including areas classified as Barren, Grassland, and Shrubland under the USGS LANDFIRE Land and Vegetation Cover data (Table 3-42). Corridor alternatives 1, 7, and 8A contain 3,280, 4,256, and 4,519 acres of potential PPC habitat, respectively.</p> <p>Julie Crawford, FWS species lead for the PPC, provided the following habitat description for the PPC, from the species' recovery plan:</p> <p><i>The taxon inhabits Lower Sonoran desert-scrubland, desert-grassland, and the ecotone (transition area) between desert-scrubland and desert-grassland, and has been documented between 728 and 1,280 meters (m) (2,388 and 4,200 feet [ft]) elevation in southeastern Arizona and northern Sonora, Mexico.” Also “The taxon is generally found on deep, silty and gravelly, alluvial soils at elevations between 728 and 1,280 m (2388 and 4,200 ft).” Also: “Although C. scheeri var. robustispina have been located on early (Holocene) and late (Pleistocene) Quaternary, as well as Cenozoic period soils, individuals appear to be more abundant on the younger (Quaternary) alluvia and less abundant on older, nutrient-poor alluvia.</i></p> <p><u>Conclusions:</u> PPC density varies greatly across seemingly suitable habitat, but PPC likely are present in considerable numbers within all corridor alternatives. Surveys will be required to confirm their presence and exact numbers.</p> <p><b>We concur, provisionally.</b></p> <p>Note: The DEIS makes two somewhat conflicting statements as to when PPC surveys will occur:</p> <p>On Page 3-162: <i>During Tier 2 analysis</i> (my emphasis), surveys would be conducted to verify suitable habitat and determine the number of PPC individuals that would be affected.</p> <p>On Page 3-163: ADOT will conduct PPC surveys <i>prior to the Tier 2 process</i> (my emphasis) to inform design, minimize the construction footprint through quality PPC habitat, and implement long-term control of noxious weeds.</p> <p>For the reasons described below, we recommend that a comprehensive effects analysis and mitigation strategy for the PPC be developed at the earliest possible date.</p> <p>Of all listed species that may be affected by the Sonoran Corridor, we are most concerned about effects to the PPC. Unlike other listed species that occur in the Sonoran Corridor study area—which tend to occur in small numbers in restricted or relatively inaccessible habitats—the PPC may occur in significant numbers within all three of the build corridor alternatives (1, 7, and 8A). The proportion (percent) of the known range-wide population that would be affected in each case is not known but is likely to be significant.</p>	



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						<p>Our primary concern is to assure that a path to avoid Section 7(a)(2) prohibitions against jeopardy is available before formal section 7 consultation on the cactus occurs during Tier 2. That assurance can be provided only if PPC numbers and distribution within the build corridor alternatives, or at least the recommended alternative, have been assessed in advance, and only if Sonoran Corridor planners and the USFWS are confident that project affects to those populations can effectively be avoided and mitigated.</p> <p>We understand that a very large area of known and potential PPC habitat is involved, and that the PPC can be difficult to detect, especially in dense cover. For this reason, systematic surveys are expensive and have not been conducted in much of this species’ range. Most available location data was gathered during small systematic surveys, often associated with specific development projects, or larger surveys that were done in high quality habitats. Some data resulted from past section 7 consultations; however, many projects that have occurred within the PPC’s range did not undergo section 7 consultation. Thus, we have no information on losses that resulted from those projects.</p> <p>The lack of information on status and trends for this species only increases our concern. What we know is this:</p> <p>As of 2018, there were fewer than 8,000 extant <i>C. scheeri</i> var. <i>robustispina</i> individuals across the range of the taxon. In addition, 1,837 are known to no longer exist, primarily due to development and mining (page iv of the Executive Summary in the 2018 recovery plan). The total of all documented PPC plants (alive and dead), found during surveys in appropriate southern Arizona habitats since 1985, and the acreage in which the surveys occurred, is 6,131 individuals in 105,786 acres (recovery plan, Appendix 1).</p> <p>The specific methods and other details of PPC surveys that must occur before or during Tier 2 are beyond the scope of these comments; however, we recommend at a minimum that thorough assessments of PPC numbers, habitat, and potential impacts occur within the Selected Corridor that advances to Tier 2. Ideally, these assessments should occur in all three corridor alternatives to determine which corridor will have the least impact on the PPC..</p> <p>Analysis of PPC occurrence and distribution <i>before</i> Tier 2, a commitment ADOT seems to make on page 3-163 of the DEIS, would inform the Tier 1 goal of comparing potential project impacts among build corridor alternatives. We understand that the recommended alternative may advance to Tier 2, but stress again that until more detailed analysis of PPC effects have been conducted, other build corridor alternatives should not be ruled out.</p> <p>In any case, the question of how to mitigate for potentially large losses of an endangered species and avoid section 7(a)(2) prohibitions is a critical one and poses a serious challenge to Sonoran Corridor planners and the USFWS. The draft EIS presents mitigation strategies for affected resources in very general terms, and includes transplanting “displaced vegetation” as a possible strategy. However, we typically do not endorse transplanting as a mitigation measure because the limited data we have indicate that survival rates of transplanted cacti may be low. Compensatory mitigation may be a viable strategy, although it, too, has certain limitations, but we found no</p>	

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						<p>reference to that approach in the DEIS. Acceptable mitigation includes the purchase of credits from an approved Pima pineapple cactus conservation bank (e.g., the Palo Alto Conservation Bank owned by Ross Humphreys). We typically require that 1 credit be purchased for each acre of PPC habitat lost (though higher quality habitat may require a higher offset ratio). However, the Palo Alto Conservation Bank likely has fewer credits available for purchase than the number of acres of PPC habitat that may be lost to construction of the Sonoran Corridor. Other forms of compensatory mitigation are available (e.g., in-lieu-fee programs, establishment of project proponent-responsible mitigation lands, or creation of third-party mitigation lands). Assuming that an effective mitigation strategy for the PPC is possible, no doubt it will involve an array of avoidance, minimization, and compensatory measures.</p> <p>Moving from the general outlines of a strategy as presented in the draft EIS to a fully developed program for mitigating effects to the PPC will require considerable thought and proactive, timely planning, and a significant field effort. The USFWS stands ready to assist ADOT in this effort in every way possible.</p>	
14	T&E Species	Table 3-41	Critical Habitat		Lehman	No ESA proposed or designated critical habitat exist within the corridor alternatives. A small amount of designated critical habitat for the jaguar is present within the study area at the base of the Santa Rita Mountains, approximately 6.3 miles east of Corridor Alternative 7 and Corridor Alternative 8A.	
15	Chapter 3, Section 3.13.3  Arizona Species of Greatest Conservation Need	3-165 To 3-176  Table 3-45	Tumamoc Globeberry		Lehman/ Crawford	<p>The Tumamoc globeberry (<i>Tumamoca macdougallii</i>) appears in Table 3-45, and is mentioned several times in Section 3.13.3. From the DEIS:</p> <p>Grows in sandy soils of valley bottoms to rocky soils of upper bajada slopes, in xeric situations, in the shade of a variety of nurse plants, along gullies and sandy washes of hills and valleys in Sonoran Desertscrub. Widespread in Pima County and may occur in the study area and corridor alternatives.</p> <p><u>ADOT Conclusions:</u> The Tumamoc globeberry occupies xeric habitats within Sonoran Desertscrub and has potential to occur within all three corridor alternatives (1, 7, and 8A). Construction of a new highway within any of the three corridor alternatives has potential to affect the Tumamoc globeberry.</p> <p><b>We concur.</b></p> <p>We listed this species as endangered in 1986, then delisted it in 1993 when it was found to be more abundant and widespread than was known at the time of listing. It is currently protected under the Arizona Native Plant Law, is salvage restricted, and it is listed by Pima County as sensitive. We highlight the species here because monitoring in recent years indicates serious declines in populations in Pima County have occurred. A summary by Reichenbacker (2012) and survey results from 2013 (Reichenbacker 2013) show that at three sites near Tucson this plant has declined by &gt;85%.</p>	

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						<p>ADOT will need to work with federal, state, and local agencies during the Tier 2 process to evaluate potential impacts to the globeberry. We recommend that a status assessment for the species be conducted within the selected alternative during Tier 2 studies to inform development of a comprehensive mitigation strategy for the species in the selected alternative.</p> <p><u>Literature Cited</u></p> <p>Reichenbacker, F. 2012. Volunteers in ecology revisit the Tumamoc globeberry. Poster presentation. Tumamoc: People and Habitats. The University of Arizona. Pima County MSCP.</p> <p>Reichenbacker, F. 2013. Monitoring the Tumamoc Globeberry – 2013. Final Report. 16 pp.</p>	
16	Chapter 3, Section 3.13.4  Wildlife Connectivity	3-176 To 3-182				<p>We encourage Sonoran Corridor planners to apply all due diligence to reduce wildlife habitat fragmentation and promote wildlife connectivity per the commitments made in the DEIS, and as listed below.</p>	
17	Chapter 3, All Subsections under 3.13, Biological Resources	-----	Environmental Consequences		Lehman	<p>ADOT presents the following summaries of potential effects of the 3 corridor alternatives for all subsections under Section 3.13: Vegetation and Wildlife, Threatened and Endangered Species, Species of Greatest Conservation Need, and Wildlife Connectivity:</p> <p><b>Alternative 1.</b>— Corridor Alternative 1 is the smallest corridor alternative and contains only one biotic community (Sonoran desertscrub). It has the least amount of xeroriparian habitat and potential PPC habitat, but the most potential SDT habitat. Because it is the shortest alternative with the smallest footprint, it will cause the least amount of habitat fragmentation. Percent of each alternative that lies within identified wildlife movement corridors (Table 3-46), at 29%, is the smallest. The status of <i>T. macdougallii</i> and its habitat is entirely unknown within Alternative 1.</p> <p><b>Alternative 7.</b>—This alternative is intermediate for potential PPC and SDT habitat affected, length, footprint size, and percent of wildlife movements corridors inside the alternative (51%), but would cause the most habitat fragmentation and has the most xeroriparian habitat. It is mostly (87%) desertscrub but has small amounts of semidesert grassland. As with Alternative 1, the status of <i>T. macdougallii</i> within this corridor alternative is entirely unknown.</p> <p><b>Alternative 8A.</b>—Has the greatest amount of potentially suitable PPC habitat and the least potential SDT habitat. It is the longest alternative with the largest footprint, but is intermediate with respect to habitat fragmentation. Percent of each alternative within identified wildlife movement corridors is greatest at 82%. The proportion of desertscrub to semidesert grassland (0.86:0.14) is very similar to Alternative 7. As with Alternative 1 and 7, the status of <i>T. macdougallii</i> within this corridor alternative is entirely unknown.</p>	

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18	Chapter 3, All Subsections under 3.13, Biological Resources	-----	Mitigation Measures		Lehman	<p>ADOT presents mitigation measures as design standards and best management practices to avoid the spread of noxious weeds, avoid negative effects to soils and water quality, control erosion, and rehabilitate disturbed areas after construction. The DEIS also includes the following measures:</p> <ul style="list-style-type: none"> <li>• Evaluate the preferred alignment during the Tier 2 process to determine general vegetation and wildlife habitat and species-specific survey needs. Develop design and construction-specific mitigation measures for migratory birds, burrowing owls, bats, and protected native plants.</li> <li>• Coordinate with the AGFD during Tier 2 to incorporate roosting sites for bats into the design of any new bridges, and drainage designs that minimize impacts to wash channel geometry and hydrologic function. Work with local native plant groups for native plant salvage and potential seed collection prior to vegetation removal.</li> <li>• Minimize loss of natural habitats by: <ul style="list-style-type: none"> <li>○ Providing construction workers with environmental awareness training, including measures to minimize impacts to the natural environment.</li> <li>○ Aligning the corridor to maximize the use of disturbed lands and minimize habitat fragmentation.</li> <li>○ Using previously disturbed areas for staging and equipment storage.</li> <li>○ Flagging and fencing sensitive habitats.</li> <li>○ Transplanting displaced vegetation to adjacent lands, when feasible.</li> <li>○ Replacing lost habitat.</li> </ul> </li> <li>• Prior to the Tier 2 process, update the IPaC query and conduct a thorough assessment of habitat for ESA-listed species and will avoid or minimize impacts to suitable habitat within the construction footprint.</li> <li>• Conduct PPC surveys prior to the Tier 2 process to inform design, minimize the construction footprint through quality PPC habitat, and implement long-term control of noxious weeds.</li> <li>• Minimize the construction footprint to the extent possible and improve drainage structures to facilitate jaguar and ocelot movement or construct wildlife crossings that jaguar and ocelots will use.</li> <li>• During the Tier 2 process, consult with USFWS regarding mitigation measures needed to avoid or minimize impacts to ESA-listed species. if it is determined that unavoidable impacts to ESA-listed species or habitat are likely to occur, compensatory mitigation will be negotiated with USFWS during Section 7 consultation as necessary.</li> <li>• Continue to honor Sonoran Desert Tortoise CCA commitments to implement the following conservation measures from the CCA: <ul style="list-style-type: none"> <li>○ Maintain ADOT ROW to minimize invasive species and fire risks as funding allows.</li> <li>○ Share maps of invasive species on ADOT ROW in SDT habitat with land managing agencies.</li> <li>○ Partner with state and federal agencies to address invasive species in and adjacent to ADOT ROW in SDT habitat.</li> <li>○ Promote awareness of the conservation status of SDT within ADOT (incorporate in trainings, post flyers in districts, ADOT blog post).</li> </ul> </li> </ul>	



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						<ul style="list-style-type: none"><li>○ Partner with AGFD and other partners to facilitate development of conservation approaches and research related to increasing road permeability for SDT.</li><li>○ Conduct habitat suitability surveys and analyze potential impacts for projects with a scope of work that could impact SDT habitat.</li><li>○ Coordinate and partner with State and Federal agencies and other interested parties to incorporate project design features where warranted to minimize SDT habitat fragmentation.</li><li>○ Coordinate and partner with State and Federal agencies and other interested parties to incorporate project design features where warranted to minimize SDT vehicle strikes.</li><li>○ Collect data on SDT sightings in ADOT ROW and provide to AGFD.</li><li>○ Partner with AGFD to facilitate development of survey and handling procedures. Follow the most current protocol for relocating any SDT that may be impacted by an ADOT construction or maintenance project.</li><li>○ Provide awareness training and/or information to ADOT and contractor personnel working on construction and maintenance projects in areas with suitable habitat.</li><li>● Coordinate with AGFD, BLM, Pima County, and other stakeholders to determine wildlife connectivity data needs and study design at that time. Fund and facilitate implementation of identified studies during Tier 2. Identify crossing structures, design features, and supporting mitigation or conservation necessary to facilitate movement of wildlife through the roadway barrier.</li><li>● Prior to Tier 2 analyses, evaluate the Pima County Wildlife Connectivity Assessment report to identify and minimize impacts to wildlife movement areas.</li><li>● Refine the roadway alignment and incorporate crossing structures during Tier 2, including overpasses, underpasses, culverts, and funnel fencing, to reduce effects on wildlife connectivity.</li></ul>	

## U.S. Department of the Interior – Attachment 2 – Additional Comments from NPS on the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation for the Sonoran Corridor Between Interstate 10 and Interstate 19 in Pima County, AZ

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1	Chapter 3	3-12	Land Management		Weldon/Skaar	<p>While the National Park Service does not own the land, the National Park Service works with partners to administer the Anza Trail. The National Historic Trail Congressional designation should be noted in the Land Management and Special Designated Lands section. And according to the National Trails Act and the 1996 Juan Bautista de Anza Comprehensive Management Plan (CMP), the National Trails System Act (NTSA) and CMP instructs the National Park Service to work with partners to create a contiguous recreation route that is within or near the historic corridor.</p> <p>The National Park Service has been included in planning efforts in Sahuarita and FICO's land planning. It has been noted that as soon as trail is built, it will be certified historic trail recreation retrace route and protected by the NTSA. Any intersection with the recreation retrace route will impact the Juan Bautista de Anza National Historic Trail locally to Sahuarita and in the greater Santa Cruz River Valley. We request that FHWA work with NPS and FICO to incorporate safe trail connectivity into the design.</p>	
2	Chapter 3 Section 3.6	3-62	Cultural Resources		Weldon/Skaar	The National Trails Act and the National Historic Trail historic corridor designation is not discussed in the analysis. The CMP identifies a historic campsite location near the preferred alternative I-19 connection point.	
3	Chapter 3	Figure 3-23	Known Archaeological Sites		Weldon/Skaar	<p>Please depict and demarcate the Juan Bautista de Anza National Historic Trail – Historic Corridor and the Anza Recreation Trail (Existing and Planned). The existing trail in Pima County is all certified historic trail recreation retrace route (Oct 2017).</p> <p>Consider depicting the historic corridor as a polygon instead of a centerline. The expedition was 250 people and 1,000 head of cattle who did not travel in a single line.</p> <p>The National Park Service can provide updated geospatial data upon request.</p>	
4	Chapter 3	3-75	Historic Buildings, Trails, Landscapes		Weldon/Skaar	Please refer to the trail by its full name, Juan Bautista de Anza National Historic Trail, or the official shortened name, Anza Trail.	
5	Chapter 3	3-75	Historic Buildings, Trails, Landscapes		Weldon/Skaar	Please describe Anza Trail historic corridor resources by working with NPS, SHPO, and other consulting parties under Section 106 of the National Historic Preservation Act (NHPA) to identify appropriate avoidance, minimization or mitigation approaches to resolve any adverse effects.	
6	Chapter 3	Figure 3-28	Public Parks, Recreation Areas, Historic Sites		Weldon/Skaar	NPS would be happy to work with FHWA to include analysis about both the Anza NHT Historic Corridor and the Recreational Retrace Route.	
	Chapter 3	Figure 3-28	Public Parks, Recreation Areas, Historic Sites		Weldon/Skaar	NPS appreciates the consideration of mitigating impacts to his multi-modal trail system. The planned alignments along the Santa Cruz River are already used informally. The Anza Trail is well-loved and well- used in the Santa Cruz River Valley and these trail connections provide the opportunity to safely use the trail from Tucson to Nogales. The NPS strongly discourages an exemption of any safe trail crossings, as it would be a significant barrier to meeting the National Trails Act and the Anza Trail CMP/FEIS – only one safe trail crossing is required on the preferred alternative.	
7	Chapter 3	Figure 3-24	Section 4(f) Resources within or adjacent to the Study Corridor		Weldon/Skaar	<p>Please depict and demarcate the Juan Bautista de Anza National Historic Trail – Historic Corridor and the Anza Recreation Trail (Existing and Planned). The existing trail in Pima County is all certified historic trail recreation retrace route (Oct 2017).</p> <p>Consider depicting the historic corridor as a polygon instead of a centerline. The expedition was 250 people and 1,000 head of cattle who did not travel in a single line.</p> <p>The National Park Service can provide updated geospatial data upon request.</p>	

U.S. Department of the Interior – Attachment 2 – Additional Comments from NPS on the Draft Tier 1 Environmental Impact Statement and Preliminary Section 4(f) Evaluation for the Sonoran Corridor Between Interstate 10 and Interstate 19 in Pima County, AZ

#	Chapter/ Section	Page/ Table	Title/ Topic	Line(s)	Reviewer	Comments	Disposition
8	Chapter 3	3-92	Section 4(f) Resources within or adjacent to the Study Corridor		Weldon/Skaar	The NTSA and the Anza Trail CMP instruct the National Park Service to work with local land owners and managers to create a contiguous recreation route within or near the historic corridor. Please consider use of these plans to identify high-use, high-priority trail routes to protect in further design. Plans: <a href="#">COVER.psd (sahuaritafarms.com)</a> <a href="#">Section 1 (sahuaritafarms.com)</a>	
10	Chapter 3	105	Air Quality Affected Environment		Miller	<i>-"The study area is in the Tucson CO limited maintenance area. EPA designated the Tucson area as being in attainment with the NAAQS for CO on April 25, 2000, and no violations of the NAAQS for CO have been recorded in this area for 20 years. The study area is approximately 6.2 miles away from the Saguaro National Park Class 1 airshed. The proximity of the study area is not considered to be notable as transportation sources do not significantly contribute to visibility impairment in Class I areas (ADEQ, 2011)."</i>  We recommend FHWA and ADOT acknowledge that visibility in Class I areas such as Saguaro National Park can be affected by pollutants including nitrogen oxides and soot. As such, we also recommend that this be part of a quantitative analysis in the Tier 2 EIS (see comments on Section 3.9.4).	
11	Chapter 3	Section 3.9.4	Air Quality Environmental Consequences		Miller	Please disclose that air quality impacts from transportation sources include emissions of nitrogen oxides and volatile organic compounds, which are precursors for ozone formation, and disclose that pollutants emitted from transportation sources will contribute to atmospheric deposition at Saguaro National Park, a Class I area.	
12	Chapter 3	Section 3.9.6	Air Quality Conclusion		Springer/Conn	Please identify if congestion along I-10 could lead to additional through-traffic to divert onto the preferred alternative in the administrative draft Final EIS for the I-11 corridor to identify potential amplification of vehicle and freight traffic impacts on park resources.  The Sonoran Corridor Tier I DEIS says that quantitative analysis of impacts from the project will be deferred to the Tier II analysis, with further subsequent quantitative studies to determine adverse air quality impacts and develop and refine detailed mitigation measures (Section 3.9.6). The NPS respectfully requests this includes a quantitative analysis of impacts to air quality and related values (such as visibility and deposition) at Saguaro National Park.	

# Arizona State Land Department

Douglas A. Ducey  
Governor



Lisa A. Atkins  
Commissioner

## Arizona State Land Department

1616 West Adams, Phoenix, AZ 85007  
(602) 542-4631

January 8, 2021

Joanna Bradley  
ADOT Communications  
1221 South Second Avenue  
Tucson, AZ 85713

RE: P9101 01P; Federal Aid No. 410-A(BFI)  
Sonoran Corridor Draft Tier 1 EIS

Dear Ms. Bradley:

As the land manager and fiduciary for Arizona's State Trust lands ("STL") and a significant property owner in the Sonoran Corridor ("Project") Project Area, the Arizona State Land Department ("ASLD") appreciates the efforts of the Arizona Department of Transportation ("ADOT") regarding the Sonoran Corridor and the opportunity to provide comment on the Tier 1 Environmental Impact Statement (the "Draft EIS").

ASLD Planning staff have participated in Project meetings for the past several years, including recent virtual meetings hosted by ADOT, and have studied the various alternative alignments proposed by the Draft EIS.

Following review of our project archives and materials recently provided, ASLD concurs with the Draft EIS conclusion that Alternative 7 be advanced as the Preferred Alternative for future study of the connection between I-10 and I-19. We note that Alternative 7 will provide future access and roadway frontage to STL in the study area, thus enhancing economic development activities that would enable ASLD to fulfill its mission to the State Trust beneficiaries while providing benefits to regional circulation.

The Department appreciates your consideration in this matter and looks forward to working with you through the remainder of this process. Please contact Jon Froke at (602) 542-3126 or [jfroke@azland.gov](mailto:jfroke@azland.gov) if you have any questions. Thank you again for allowing us the opportunity to participate in this endeavor.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Edelman".

Mark Edelman, AICP  
Director  
Planning & Engineering Division

cc: Jim Perry, Deputy State Land Commissioner  
Jon Froke, AICP, Planning & Engineering Division

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# Pima County



## COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER  
130 W. CONGRESS, FLOOR 10, TUCSON, AZ 85701-1317  
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C.H. HUCKELBERRY  
County Administrator

January 4, 2021

Sonoran Corridor Tier 1 EIS Study Team  
c/o Joanna Bradley  
1221 South Second Avenue, MDT100  
Tucson, AZ 85713

Dear Ms. Bradley and Study Team,

Pima County appreciates the opportunity to comment on the Sonoran Corridor Tier 1 Draft Environmental Impact Statement. Pima County has multiple interests and roles in addressing a major infrastructure project such as the Sonoran Corridor including expanding the economic and employment base of the region by improving the flow of employees, finished goods and raw materials and providing access to economic growth areas.

Pima County appreciates the careful consideration of all potential alignments and the recommendation of an alignment that provides direct access to the Tucson International Airport and adjacent major employers, both current and planned. However, while we understand the reasons why the study team has selected Alternative 7, we continue to believe that Alternative 1 near Pima Mine Road best serves existing employers and economic activity (namely the Desert Diamond Casino) and future planned development by the San Xavier District. However, if the San Xavier District opposes this alignment, we will certainly support the District and Tohono O'odham Nation in their decision. While Alternative 7 could spur future economic development in the town of Sahuarita, existing and planned employers and business activity are assured to benefit from Alternative 1. For these and the following reasons, Pima County recommends that Alternative 1 remain under consideration at this time:

1. The Tucson Airport Authority has recently abandoned plans for a third runway, thereby opening up more than 600 acres for logistics development along the Alvernon Way corridor;
2. Active development of the UArizona Technology and Innovation Park at Rita Road and Pima County's Southeast Employment and Logistics Center at the Fairgrounds;

# Pima County

Ms. Joanna Bradley  
Re: **Sonoran Corridor Tier 1 DEIS**  
January 4, 2021  
Page 2

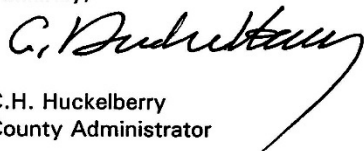
3. Tucson Electric Power's Sonoran TEP's Sonoran Substation on Swan Road just south of Old Vail Connection Road and Tucson Water's investment in the Eisenhower storage and treatment plant and distribution infrastructure in the area signal the imminent growth of logistics and industrial development around the Alvernon Way and Old Vail Connection Road area;
4. Alternative 1 was consistently the highest scoring alternative, provides for a significantly less expensive implementation, and does not preclude the subsequent extension along the Alvernon Way alignment through Sahuarita as depicted in Alternative 7 as future demand and need warrant.

Pima County understands that the Sonoran Corridor will very likely be implemented in segments as funding becomes available. We strongly recommend the first priority being a corridor along the Old Vail Connection Road alignment from the Alvernon Way alignment to Interstate 10 at the Rita Road Interchange with a connection to the Aerospace Corridor. This first segment of the Sonoran Corridor will provide immediate and significant traffic congestion relief on Interstates 19 and 10 within the urban area and support existing and expanding business development near Tucson International Airport. We therefore recommend that the initial Tier 2 study focus specifically on this segment of the recommended alignment.

Pima County staff has reviewed the draft EIS and our Office of Sustainability and Conservation has provided detailed comments on Chapter 3: Existing Conditions and Potential Environmental Consequences, provided as an attachment to this letter.

Again, Pima County appreciates the opportunity to comment on the Sonoran Corridor Tier 1 Draft Environmental Impact Statement. We look forward to being a partner in the development of this important major infrastructure project.

Sincerely,



C.H. Huckelberry  
County Administrator

Attachment

- c: Carmine DeBonis, Jr, Deputy County Administrator for Public Works  
Yves Khawam, PhD, Assistant County Administrator for Public Works  
Ana Olivares, Director, Transportation Department

## ATTACHMENT

### Comments re: Chapter 3, Existing Conditions and Potential Environmental Consequences From Pima County Office of Sustainability and Conservation

1. **Page 3-64, Table 3-19, Cultural Resources:** Suggest that this table should include local policies/ordinances/resolutions (e.g. Board of Supervisor Policy C 3.17) for a more comprehensive presentation under "Other Authorities".
2. **Page 3-66, Section 3.6.2, Methodology, 1<sup>st</sup> paragraph:** This section presents only prehistoric and historic periods, while this paragraph identifies "protohistoric". Suggest checking document in order to ensure consistency in presentation of temporal periods.
3. **Page 3-66, Section 3.6.2, Methodology, 1<sup>st</sup> paragraph:** "In Arizona, historic structures such as roads..." The AZ State Museum has revised their policy on how archaeological sites are defined. Suggest adding language noting that not all structures are classified as archaeological sites. For Section 106 purposes, this is problematic, thus we recommend that historic structures are consistently defined throughout the EIS process as structures, regardless of whether they have archaeological site numbers.
4. **Page 3-66, Section 3.6.2.1, 5<sup>th</sup> paragraph, "preliminary APE":** Subsequent paragraph discusses and defines direct and indirect effects, and so does this "preliminary APE" include both, or is it only an analysis of potential for direct impacts?
5. **Page 3-67, Section 3.6.2.3, 4<sup>th</sup> paragraph:** This paragraph contains a typo: "While the determination of effects on cultural resources is not being \_\_\_\_?\_\_\_\_ at this time."
6. **Page 3-81, Section 3.6.5:** As presented, these mitigation strategies are founded on presumptive methods that rely upon a "one size fits all" approach to minimizing impacts to cultural resources. Any mitigation that is needed should be outlined through consultation efforts and a programmatic agreement, during which time, the nature and significance of each cultural resource that may be impacted is assessed and an appropriate mitigation strategy is selected.
7. **Page 3-82, Table 3-27:** This type of weighted approach for evaluating levels of potential impacts can be misleading. Alternative 1 is determined to have "high impacts" to cultural resources due mostly to the potential impacts to one site, yet Alternative 8A is determined to have "moderate impacts" despite having more known archaeological sites. There is not enough data at this point to make that determination.
8. **Page 3-148, Species of Economic and Recreational Importance:** The analysis states that construction of new highways would likely not have a significant impact on SERI species, based on the habitat in the study area being of low-moderate value to hunters. However, it is likely that the same issues of habitat fragmentation, road mortality, and other issues reported in the analysis as impacting other species would also negatively impact some game species (i.e., mule deer). Whether these issues would appreciably impact certain game species hunted elsewhere outside of the study area is unknown (e.g., more broadly ranging species like mule deer), but something that should be considered.



9. **Page 3-156, Table 3-41, Yellow-billed cuckoo:** The following paragraphs provide supplemental information and recommendations for this species. There is a low chance that this species would occur as breeding individuals in areas covered by the study area. However, areas with well-developed mesquite and other xeric riparian species may be important habitat for cuckoos to rest and forage in during migration, particularly those well vegetated areas closer to the main tributary of the Santa Cruz River in some of the larger drainages indicated in the study area (The Santa Cruz River corridor is heavily used by many migrating bird species).

Potential Indirect Impacts: Any increase in highways and associated vehicular traffic would increase the risk of vehicle strikes and associated mortality for cuckoos moving through the area. Further, cuckoos and many other migratory birds frequently migrate at night, and can readily become disoriented by lighting that pollutes the night sky, sometimes leading to fatal impacts to buildings/equipment, as well as generally having a negative impact on their migration and survival.

Species-specific Recommendations: Avoid any unnecessary night lighting. Spring and fall migration are especially sensitive periods, so if possible it is beneficial to particularly reduce or eliminate night lighting during March through May and August through early November. Any lighting at night that must be in place should be shielded such that it is not directed upwards.

10. **Page 3-157, Table 3-41 and Page 3-158, Sonoran Desert tortoise:** The following paragraphs provide supplemental information and recommendations for this species. This species is not likely to occur within the study area. Rosen (2010) found tortoises and their sign in very low densities in the south-southeast part of the project area, and concluded that the habitat likely supported few tortoises there. Though survey effort was much less in the western part of the project area, no tortoises or their sign were found there and it is unlikely that significant populations of tortoises inhabit the area. Rosen (2010) also did not observe any tortoise sign in the area south of the Rita Rd. interchange. (Northeast of this, and north of I-10, there are high-density populations of Sonoran Desert tortoise closer to the Pantano Wash and Cienega Creek). However, one recent observation of a Sonoran Desert tortoise carcass south of I-10, in the region of analysis segment #4, may indicate occurrence of Sonoran Desert tortoises at low density, or, more likely, dispersing individuals, particularly given that this observation was close to known high density populations on the north side of I-10 (Rosen 2010). Beyond this observation, we are not aware of any high density tortoise populations in the study area.

Potential Indirect Impacts: Though I-10 and I-19 and associated roads and railroad tracks already represent considerable barriers to movement of tortoises and other animals across the landscape, all of the corridor alternatives would further negatively impact any potential exchange of individual tortoises (or other animals) between populations west of I-19, north of I-10, and the northern Santa Rita foothills (as is already acknowledged).

Species-specific Recommendations: Any drainage structures or underpasses that are to be modified or created for use by wildlife could also be evaluated as to how best to maximize ability of tortoises to successfully navigate them. For example, a report by



AZGFD for ADOT discusses how perched culvert entrances may be modified to allow potential use by desert tortoises (and other small animals), as well as discussing other considerations (AZGFD 2012). Given a scarcity of monitoring and effectiveness data for these and other modifications meant to enhance use of underpasses by tortoises, any investment in better understanding how best to maximize desert tortoise use of these structures would be of significant benefit here and elsewhere.

11. **Page 3-158, first paragraph, Pima pineapple cactus (PPC):** The density estimate given in the analysis (0.058 PPC per acre) may be lower than the likely density of PPC over the study area. Given known differences in density across habitats, we suggest calculating the estimated cactus densities from each survey or study, and then averaging those densities, which yields a density estimate of 0.65 PPC per acre. This density is more in line with the approximately 0.4 cactus per acre estimate reported in Baker (2013) and McDonald (2003). Additionally, Flesch et al. (2019) found some evidence suggesting that PPC densities may be up to about a 1/3 higher in desert grasslands versus desert scrub environments which may mean that desert grassland habitat in the study area (largely in the southeast part of the study area) may hold higher numbers of cactus. The following paragraphs provide supplemental information and recommendations for this species.

Potential Indirect Impacts: It is important to consider additional possible negative impacts to PPC that are beyond the direct loss of plants and their habitat. Ground disturbance activities and roadsides/staging areas are well known mechanisms and features through which invasive plant species, such as various nonnative grasses can gain a foothold in a landscape and spread. Increases in invasive grass cover could increase PPC mortality through an increase in fire as well as competition for resources. Increased fragmentation of the landscape could also negatively impact the insect pollinators of PPC as well as animal species that may disperse PPC seeds, which would negatively impact PPC population persistence in remaining habitat (USFWS 2018 and references therein). Removal of native cactus species such as cholla, barrel cactus, and prickly pear cactus, may be detrimental to PPC pollinators because many of the insects that pollinate PPC, including cactus bees in the genus *Diadasia* are dependent upon other species of cactus to provide floral resources outside of the very narrow period of time that PPC flower.

Species-specific Recommendations: PPC that must be relocated for this project should be moved while following an approved transplant protocol, including any necessary post-transplanting monitoring and supplemental watering. We recommend salvage and/or retention of native cactus species where possible as a means to benefit PPC pollinators and ultimately the ability of PPC to reproduce successfully. Further, any transplant protocol should ensure that PPC are placed in suitable habitat that contains a variety of native cactus species to maximize the potential for suitable pollinators to be present.

12. **Page 3-168, Table 3-45, Swainson's hawk:** The following paragraphs provide supplemental information and recommendations for this species. This species occurs in desert grasslands and desert scrublands and is known to breed not far south of the study area (i.e., closer to the Santa Rita Experimental Range), as well as north of the study area. It commonly migrates through the study area, especially along the Santa Cruz River, and may also breed in some locations of the study area. Unlike some raptor

# Pima County

species, it may build its nest in relatively short trees (e.g., mesquites), particularly due to the often limiting presence of tall trees in the open areas that it occurs in. Some other raptors, including red-tailed hawks and great-horned owls will also nest in relatively short trees, as well as multi-limbed saguaro cactus.

Species-specific Recommendations: Any identified nests of this or other raptor species should have a protective zone applied around the nest site (e.g., limit disturbance within 400 meters of a nest site; Pima County 2016), such that disturbance and subsequent abandonment are minimized until young are fledged.

13. **Page 3-169, Table 3-45 and Page 3-172, Tumamoc globeberry:** The following paragraphs provide supplemental information and recommendations for this species. This plant has been observed near the segment # 1 analysis area. This plant of conservation concern is notoriously difficult to survey for given its cryptic habit of growing within other shrub species, as well as the relatively narrow window of time when its stems, leaves, and fruits are visible above ground. Observations of this species from the area around segment #1 indicate that it was growing within open mesquite-creosote shrublands in sandy-loam, a habitat type which is widespread throughout the study area.

The Tumamoc globeberry habitat model built based on the known habitat requirements of this plant species, and that which is used by Pima County's MSCP (Pima County 2016) indicates that most of the area crossed by alternatives 1, 7, and 8A is medium to high quality modeled globeberry habitat, indicating that there is a high likelihood of occurrence for this species throughout the study area, which is already acknowledged in the draft Tier 1 EIS.

Species-specific Recommendations: Surveys for this species are most effective in late summer-early fall, when its bright red fruits make the otherwise hidden and delicate vine more detectable, especially when it is growing intertwined within other shrubs.

14. **Page 3-169, Table 3-45, Mesquite mouse:** This species (*Peromyscus merriami*), or Merriam's mouse is not included in the Draft Tier 1 EIS; however, it is on the U.S. Forest Service (USFS) Region 3 Regional Forester's Sensitive Species list (USFS 2013) and is covered by the County's MSCP. It is suggested that this species be considered for inclusion in this report.

Reasons to include this species in future analyses: The Mesquite mouse is a species of conservation concern that occurs in mesquite-dominated habitats, or mesquite bosques (Pima County 2016). It is generally found in lower lying areas, often along streams, and washes, and avoids steep or rocky areas. Numerous historical collection records exist for this species along the Santa Cruz River south of Tucson, including in some areas that are near analysis segments #2 and #1. Areas where this species was collected historically may have been altered through development and agriculture, but any dense growth of mesquites along or within larger washes that drain into the Santa Cruz River could harbor this species. For example, in 2004 mesquite mice were trapped in mesquite thickets in and near analysis segment #2 (SWCA Environmental Consultants 2005). It is likely that the species also occurs in similar mesquite thickets in the study area that are in or near drainages draining into the Santa Cruz River. Some of these well-developed areas of

# Pima County

mesquite and other xeric riparian vegetation in the study area are obvious and readily detectable on aerial imagery. Mesquite bosques or thickets that are otherwise connected or adjacent to historical or current mesquite bosques in the main tributary of the Santa Cruz River are likely to have the highest likelihood of mesquite mouse occupancy, relative to areas of thick mesquite that are further away and more isolated from the main tributary in the central part of the study area.

Pima County's priority conservation area (areas that Pima County and independent species experts evaluated as being especially important for species covered by the County's MSCP) for this mouse species overlaps with parts of analysis segments #1 and #2, near the Santa Cruz River (Pima County 2016). For these reasons we encourage ADOT to include this species in future environmental impact analyses for this project and consider measures that may minimize and mitigate potential impacts to the species and its habitat.

- 15. Page 3-169, Table 3-45, Sinaloan narrow-mouthed toad:** This species (*Gastrophryne mazatlanensis*) is not included in the draft Tier 1 EIS, but was recently recognized as distinct from the western narrow-mouthed toad (*Gastrophryne olivacea*) which was previously considered to be the species occurring in Arizona including within the study area. It is suggested that this species be considered for inclusion in this report.

Reasons to include this species in future analyses: Within the United States, the Sinaloan narrow-mouthed toad is only known to occur in Arizona (as well as further south into Mexico). Rosen and Funicelli (2008) indicated that populations that are known to occur in the study area (i.e., east of I-19 and south of I-10) were only relatively recently discovered, after the species had originally been thought to have been extirpated in the Tucson area. Multiple breeding sites containing this species occur in the study area, which is near the northeastern edge of its distribution.

This small nocturnal toad is secretive and difficult to detect. It is most readily detected during its monsoon breeding season, particularly after the first heavy rains of a particular season when the distinctive call of the male may be heard. Its tadpoles are also distinctive and a trained observer may readily differentiate them from other more common amphibian species breeding in ephemeral waters.

It is likely that areas that collect ponded water after rainfall events, as well as stock tanks or other fish-less impoundments that are throughout the study area have a high potential to harbor this species. Water bodies where this species have been found breeding are often in or near dense vegetation, including mesquite and various grasses. This species does not require permanent water and tadpoles are capable of metamorphosing in 18-40 days (Rosen and Funicelli 2008).

Recent observations of this species (generally at breeding sites) include areas near segments # 2 and # 4 of the analysis area, so we encourage ADOT to include this distinct species in future environmental impact analyses for this project. Additionally, avoiding to the extent possible thickly vegetated (i.e., mesquite bosques) low-lying areas where water collects, as well as other types of features holding water such as dirt tanks or gravel pits, would benefit this sensitive species, as well as a host of other native species.



**16. Page 3-176, Section 3.13.4, Wildlife Connectivity:** The R22 Lee Moore Wash flow corridors are the network of xeric-riparian wash corridors throughout the study area that may potentially be impacted by this project. No specific examples are given of species that may rely and/or use these corridors; however, based on known biology and occurrences, javelina and mule deer most certainly move through and use these habitat elements. Additionally, gambel's quail and dove are known to prefer and heavily use xeric-riparian washes for roosting, feeding, and shelter. All of these species are species of economic and recreational importance that may be impacted by impediments and/or destruction of some of these corridor elements.

**17. Page 3-181, Section 3.13.4.5, Available Mitigation Measures:** We encourage the use and refinement of the mitigation measures indicated as being available to offset detrimental impacts to wildlife connectivity, including the potential placement of wildlife crossing structures in suitable places. Any opportunities to enhance the ability of wildlife to move across I-19 and the associated frontage roads and railroad are incredibly valuable, in addition to appropriate structures to allow movement across the corridor segments themselves.

**18. Page 3-181, Section 3.13.4.5, Available Mitigation Measures:** We appreciate the agency's efforts to partner with Pima County and other stakeholders on efforts to maintain and enhance regional wildlife connectivity. As discussed in the Tier 1 Draft EIS, we look forward to continuing to partner with ADOT and other stakeholders "to determine wildlife connectivity data needs and study design," as well as "identify the crossing structures, design features, and supporting mitigation or conservation necessary to facilitate movement of wildlife through the roadway barrier."

**19. Page 3-181, Section 3.13.4.5, Available Mitigation Measures:** It is understood that specific mitigation measures will be developed during Tier 2 process. Suggested measures during construction activities include:

- a) Cap or otherwise cover all open-topped pipes  $\geq 1$  inch in diameter to prevent cavity-dwelling birds and other animals from entering and becoming trapped.
- b) Install barriers around trenches or holes to prevent small animals, including tortoises, from becoming trapped.
- c) Minimize to the extent possible the period of time that trenches or deep holes are left open and available for animals to enter and become trapped inside of.
- d) Minimize to the extent possible the clearing of shrubs, trees, and other dense vegetation, particularly those growing in xeric-riparian areas, during the bird nesting season of March-September.
- e) Strive to maintain connectivity of riparian wash corridors that serve as important conduits of animal movement across the landscape. These wash corridors provide links for some species between the Sierrita Mountains west of I-19 and areas, including the northern Santa Rita Mountains and the Santa Cruz River, east of I-19.



# Pima County

- f) Where possible store topsoil nearby those areas scraped/cleared and replace for those areas that are meant to be restored. This maximizes the ability of beneficial microbes and fungi to contribute to the success of planted/seeded native plant species.
- g) The DEIS states that all disturbed soils that are not paved, landscaped, or permanently stabilized will be seeded using native species. If possible, source seeds representative of those particular species that were collected grown as close as possible (i.e., avoiding seeds from species that are native to the area but that were cultivated or collected from stock that occurs in a different region or desert).

## References

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- Baker, M. 2013. A demographic study of *Coryphantha robustispina* ssp. *robustispina* Progress report for the 2012 field season and final report for the study. Report for USDI Bureau of Reclamation, Grant No. R08AP32230, 66 pp.
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- Pima County. 2016. Multi-species Conservation Plan for Pima County, Arizona: Final. Submitted to the Arizona Ecological Services office of the U.S. Fish and Wildlife Service, Tucson, AZ.
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- Rosen, P.C. 2010. Desert Tortoise Habitat model City of Tucson Southlands HCP Area. Unpublished report to the City of Tucson, Tucson, AZ.
- SWCA Environmental Consultants. 2005. Evaluation of mesquite mouse (*Peromyscus merriami*) status in Pima County, Arizona. Unpublished report to the Pima County Department of Transportation and Flood Control District, Tucson, AZ.
- USFWS. 2018. Recovery Plan for *Coryphantha scheeri* var. *robustispina* (Pima pineapple cactus) U.S. Fish and Wildlife Service, Southwest Region, Tucson, AZ.

# City of Tucson



**CITY OF  
TUCSON**  
Office of the  
City Manager

January 7, 2021

Sonoran Corridor Tier 1 EIS Study Team  
c/o Joanna Bradley Arizona Department of Transportation  
1221 South Second Avenue, MD T100  
Tucson, AZ 85713  
[sonorancorridor@azdot.gov](mailto:sonorancorridor@azdot.gov)

RE: Draft Sonoran Corridor Tier 1 Environmental Impact Statement

Dear Sonoran Corridor Tier 1 EIS Study Team:

The City of Tucson appreciates the opportunity to provide comments on the Draft Sonoran Corridor Tier 1 Environmental Impact Statement (EIS). Thank you for the great work of the staff of Arizona Department of Transportation (ADOT) and the Federal Highway Administration (FHWA) in getting to this point in the process.

The City's interest in the Sonoran Corridor lies primarily with the location of the northernmost segment of the corridors under evaluation. The City's preference is for the Sonoran Corridor to be located within Segment 5 of the alternatives, which is common to both Alternatives 1 and 7. Segment 5 best supports the economic interests of the city due to a potential tie-in with Alvernon Way, providing improved access to the Tucson International Airport (TUS) and the growing Aerospace Research Campus. The connection at Rita Road on the other end of the segment is beneficial to the University of Arizona Tech Park, the Port of Tucson, and other industrial and warehousing employment centers in the area.

The City is supportive of advancing either Alternative 1 or Alternative 7 over the No Build Alternative, since both include Segment 5. We agree with the findings of the Draft Tier 1 EIS that Alternative 7 best meets the Need and Purpose of the Draft EIS, including improving the transportation system to support future growth, providing additional system linkages, and reducing congestion. However, Alternative 7 has a greater potential impact on housing developments and individual residences, since Segment 1 of Alternative 7 traverses more developed areas and will potentially have a higher cost than Alternative 1 given the greater length of the alternative. As the study advances to Tier 2, The City of Tucson encourages ADOT to continue to engage and incorporate feedback from the Tohono O'odham Nation and the Pascua Yaqui Tribe. The City will also continue to coordinate with and listen to the Tribe and the Nation to make sure their issues are being addressed.

Whichever alternative is advanced, as funding becomes available the City encourages prioritizing Segment 5 for a future Tier 2 EIS given the above stated reasons. Segment 5 can function independently of the other corridor segments to provide a critical connection between the major employment centers at TUS and Rita Rd, such as Raytheon Missile Systems.

The City of Tucson would once again like to express our gratitude to FHWA and ADOT for moving this process forward. We encourage ADOT and FHWA to continue moving this forward. The Sonoran Corridor is an important project for all of us in Southern Arizona as we look to strengthen our economy by leveraging and fortifying our position as an international port and logistics center.

Sincerely,

Michael J. Ortega, P.E.  
City Manager

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# Tucson Airport Authority



December 30, 2020

ADOT Communications  
C/O Joanna Bradley  
1221 S. Second Ave.  
Tucson, AZ 85713

Dear ADOT Communications:

Thank you for the opportunity to comment on the ADOT Sonoran Corridor Draft Tier I Environmental Impact Statement (EIS). The Tucson Airport Authority (TAA) continues to support the proposed development of the Sonoran Corridor and supports Preferred Corridor Alternative 7.

The TAA requests that ADOT's Preferred Corridor Alternative 7 include the evaluation of the TEP Vail to Tortolita 230 Kilovolt Transmission Line Project that is also in development. Due to the constraints of the existing gravel pits and TEP lines, it may be beneficial to shift the study corridor approximately 500' south between Wilmot and Alvernon. This will shift more of the 2000' wide corridor onto TAA Property. Placing the alignment of Selected Alternative on this portion of TAA property will enable TEP and WAPA to proceed forward with their 230 kV transmission line project without having an adverse impact on the future Sonoran Corridor. This approach also supports the future economic development of adjacent TAA property.

Please contact me if you have any questions or concerns regarding this correspondence. I can be reached by email at [dbewley@flytucson.com](mailto:dbewley@flytucson.com) or by telephone at 520-573-8100.

Best regards,

A handwritten signature in dark ink, appearing to read "dbewley".

Danette M. Bewley, A.A.E.,  
President/CEO

cc: Mike Smejkal, Vice President of Planning and Engineering  
Scott Robidoux, Senior Airport Planner



Danette M. Bewley, A.A.E.  
President/CEO  
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# Tucson Electric Power



Tucson Electric Power  
88 East Broadway Blvd., Post Office Box 711  
Tucson, Arizona 85702

January 7th, 2021

ADOT Communications  
c/o Joanna Bradley  
1221 South Second Avenue  
Tucson, AZ 85713

Dear Ms. Bradley,

Tucson Electric Power (TEP) has reviewed the Tier 1 Environmental Impact Statement for the Sonoran Corridor Project, Interstate 19 to Interstate 10 South of Tucson International Airport, and appreciates the opportunity to provide the following comments. TEP supports the project, and offers comment pertaining to the location of the future right-of-way alignment for Alternative 7 (Preferred Alternative) and Alternative 1 in the location of Old Vail Connection Road, with emphasis on the relationship between the Sonoran Corridor right-of-way alignment and existing and planned electrical transmission lines, which include three existing 138 kilovolt (kV) transmission lines and a planned 230 kV transmission line, as well as several existing and planned 46 kV sub-transmission and distribution circuits.

TEP understands that a 2,000'-wide corridor was used as a basis of review in the Tier 1 EIS, and during Tier 2 studies a more constrained approximately 400' right-of-way alignment will be identified. TEP would like to suggest for consideration that the right-of-way alignment for the Sonoran Corridor be located south of existing TEP electrical transmission facilities along Old Vail Connection Road between Alvernon Way and the Craycroft Road alignment (see Figure 1). Other utilities, such as, but not limited to Pima County sewer are also located in the Old Vail Connection Road alignment and depicted on Figure 1.

Placement of the future right-of-way south of these existing utilities will ensure that TEP maintains safe, reliable service for customers throughout Tucson who are served by these facilities and would also reduce costs to relocate them were the right-of-way to be placed in the Old Vail Connection Road alignment. Conversations with Pima County and the Tucson Airport Authority confirm that they are also supportive of this proposal.

Thank you for your time and consideration of the comment.

Warm regards,

A handwritten signature in blue ink that reads "Renee Darling". The signature is fluid and cursive.

Renee Darling  
Transmission and Distribution Supervisor



# Tucson Electric Power



Tucson Electric Power  
88 East Broadway Blvd., Post Office Box 711  
Tucson, Arizona 85702

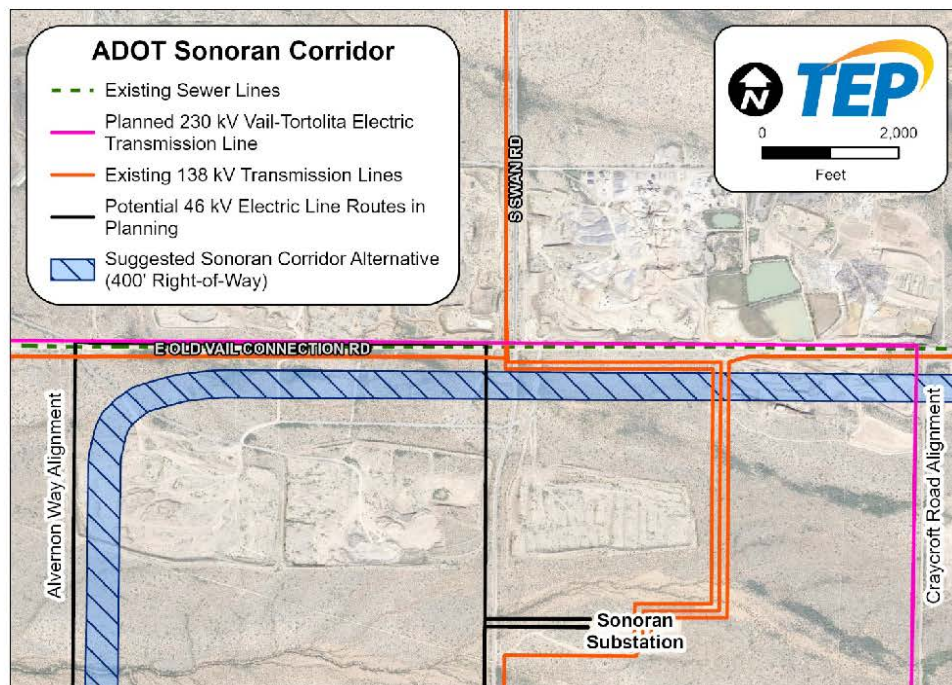


Figure 1. Graphic showing the suggested Sonoran Corridor route in relation to existing and planned electric transmission lines, and existing sewer line, which is located in Old Vail Connection Road alignment.

# Santa Cruz County



## Board of Supervisors Santa Cruz County

BRUCE BRACKER  
District 3

December 1, 2020

Director John Halikowski  
Arizona Department of Transportation  
1801 W. Jefferson St.  
Phoenix AZ 85007

Director Halikowski,

I am writing to support the advancement of the Sonoran Corridor. The completion of a bypass from I-19 to I-10 east of Tucson is essential to help eliminate much of the congestion in the I-19/I-10 interchange that carries both local traffic as well as being the principal connector to much of the Arizona-Mexico trade that crosses the border at Santa Cruz County. This bypass is critical to maintaining the competitiveness of the Fresh Produce and Maquila industries that drive the economy of Santa Cruz County and are critical to the Arizona-Mexico corridor.

Referencing the 2013 University of Arizona Eller College of Management Economic and Business Research Center study on Fresh Produce and Production Sharing these industries combined account for 50% of the economic output of Santa Cruz County and combined employment of over 3,780 employees. Together these industries represent more than \$29 billion of imports and exports through the Nogales port of entry system each year, products that are essential to American businesses, and of great value to American consumers.

Another critical reason for this bypass is that currently many trucking companies that serve these industries utilize SR-82, connecting to SR-90, as a shortcut from Santa Cruz County to I-10 as they proceed east. SR-82, for the most part, lacks shoulders and is designated a scenic corridor, a designation that is crucial to our local economy and key sectors like birding and the local wine industry, as it the principal connector between I-19 to the eastern portion of our county. Tourism on SR-82 contributes over \$5 million dollars each year to our local economy and supports many hotel, Bed & Breakfasts, restaurant and retail jobs in the eastern portion of Santa Cruz County.

My preference in this study is Corridor Alternative 1. Primarily because it reduces travel time for the tractor trailers the service all points east of I-19, but also because it allows access to central and eastern Tucson from Santa Cruz County. Again, the Sonoran Corridor is more than just a local road. It is a great enhancer to regional and global logistics and as such, it must remain a priority project for Arizona.

Thank you very much for your consideration.

Sincerely,

A blue ink signature of Bruce Bracker, consisting of stylized initials and a surname.

Bruce Bracker

---

Santa Cruz County Complex  
2150 N. Congress Drive • P.O. Box 1150 • Nogales, Arizona 85621  
(520) 375-7812 • FAX (520) 761-7843 • TDD (520) 375-7934

# San Xavier District Allottee Association



**SAN XAVIER ALLOTTEES ASSOCIATION, INC.**  
325 East Vamori Street, Tucson, Arizona 85756  
Office 520.807.2121 Fax 520.807.2626 Website [www.sanxavierallottees.org](http://www.sanxavierallottees.org)

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## RESOLUTION

Affirming the Opposing Decision and Position of the San Xavier Allottees whom have Direct Interest in the Proposed Sonoran Corridor Proposal, Alternative 1.

Resolution No. 34-2021

- WHEREAS, In May 2017, the Federal Highway Administration (FHWA), in coordination with the Arizona Department of Transportation (ADOT), issued the Notice of Intent for development of a potential new corridor route that would connect Interstate 19 and Interstate 10 south of Tucson International Airport; and
- WHEREAS, Consultation meetings and correspondences provided by the FHWA and ADOT occurred with the San Xavier District, the San Xavier Allottees Association as well as affected Allottees specifically for this project as illustrated in Alternative 1 for this proposed Corridor; and
- WHEREAS, A survey posing the question of whether or not Allottees in Alternative 1 are in favor of the proposed Corridor to cross their allotted land where they hold interest was mailed out to them for a response in 2019; and
- WHEREAS, The majority response of the Allottees surveyed was in Opposition of the proposed Sonoran Corridor Alternative 1 option; and
- WHEREAS, SXAA has represented the Allottees position against Alternative 1 stating primarily the increase level of pollution and disturbance of the natural state of the land(s) in that area; and
- WHEREAS, A Tier 1 Environmental Impact Statement (EIS) has been performed in accordance with the National Environmental Policy Act (NEPA) and other regulatory requirements of which did not include the Alternative 1 site as a part of this EIS; and
- WHEREAS, as part of the NEPA process, ADOT and the FHWA are engaging and involving stakeholder agencies, organizations, and members of the public throughout the study process and held public hearings and time provided for comment to the EIS; and
- WHEREAS, the SXAA, who has participated and continues to participate with FHWA and ADOT, in support of their effort to engage in tribal and public participation efforts with the general public, understands as a vital part of the foundation of the Tier 1 EIS the basis for identifying, evaluating



# San Xavier District Allottee Association



## SAN XAVIER ALLOTTEES ASSOCIATION, INC.

325 East Vamori Street, Tucson, Arizona 85756

Office 520.807.2121 Fax 520.807.2626 Website [www.sanxavierallottees.org](http://www.sanxavierallottees.org)

and screening corridor alternatives and will be a key component in selecting a Preferred Alternative for the Sonoran Corridor.

WHEREAS, Despite the deadline for the comment period to the drafted EIS has expired, the San Xavier Allottees Association, Inc. (SXAA) has the responsibility to act in the best interests of its members as articulated in its mission *"To assist San Xavier allottees to preserve, improve their land and to educate them on water rights, environmental protection and economic development."*

NOW THEREFORE BE IT RESOLVED by the San Xavier Allottees Association, Inc. Board of Directors that it hereby presents its position against Alternative 1 that was codified in the Sonoran Corridor Tier I Draft Environmental Impact Study, on behalf of the Allottees.

BE IT FURTHER RESOLVED that the SXAA disagrees and opposes the submitted letter from Chairman Ned Norris of the Tohono O'odham Nation, regarding, **Draft Sonoran Corridor Tier 1 Environmental Impact Statement**, submitted on January 8, 2021, where he states, *"the Nation believes further analysis of Alternative 1 as this process moves forward would be prudent. we request that Alternative 1 be retained as an Alternate Route for future joint analysis in addition to the recommended Alternative 7. This is an important project and has the potential to provide a significant benefit to the entire region. We encourage you to retain Alternative 1 in the planning process."*

### CERTIFICATION

The foregoing resolution was passed at a meeting of the Board of Directors for the San Xavier Allottees Association held on the 11 day of March, 2021, at which a quorum was present, with a vote of 6 For, 0 Against, 0 Not Voting and 1 Absent.

SAN XAVIER ALLOTTEES ASSOCIATION, INC.

Adam P. Andrews, SXAA Board President

Attest:

Ben Standifer, Executive Director serving as Board Secretary

Motion: Tony Burrell, as amended

Second: Sheila Espino