



SONORAN
CORRIDOR STUDY

FEIS APPENDIX E – RESPONSES TO AGENCY COMMENTS

October 2021

ADOT



U.S. Department of Transportation
Federal Highway
Administration

APPENDIX E – RESPONSES TO AGENCY COMMENTS

Response Letters to Agencies and Stakeholder organizations that submitted comment letters on the Draft Tier 1 EIS appear on the following pages, as listed below:

- U.S. Department of Interior - Bureau of Reclamation
- U.S. Department of Interior – Fish and Wildlife Service
- U.S. Department of Interior - National Park Service
- Arizona Game and Fish Department
- Tohono O’odham Nation
- Arizona State Land Department
- Pima County
- City of Tucson
- Tucson Airport Authority
- Santa Cruz County
- Tucson Electric Power

U.S. Department of Interior - Bureau of Reclamation



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September 24, 2021

In Reply Refer To:

410-A(BFI)
TRACS No. 410 PM 0.0 P9100 05P
Sonoran Corridor Tier 1 EIS
Comment Letter Response

Sean M. Heath
Manager, Environmental Resource Management Division
U.S. Department of the Interior
Bureau of Reclamation
Phoenix Area Office
6150 West Thunderbird Road
Glendale, AZ 85306-4001

RE: Sonoran Corridor Tier 1 Draft Environmental Impact Statement

Dear Mr. Heath:

Thank you for the Bureau of Reclamation (BOR) ongoing participation as a Cooperating Agency in the Sonoran Corridor Tier 1 Environmental Impact Statement (EIS) study. BOR comments on the Draft Tier 1 EIS offered in your letter dated January 8, 2021 will be addressed in the Final Tier 1 EIS as part of the Errata section of the document. Specifically, corrections and clarifications have been incorporated into the text where indicated, and the conflation of facilities between BOR and the Tohono O'odham Nation San Xavier District (TON-SXD) has been restructured to reflect BOR's direction.

We also recognize the concerns about BOR's obligations regarding Southern Arizona Water Rights Settlement Act (SAWRSA) and Arizona Water Rights Settlement (AWSA), and the recommendation that the project continue to coordinate with the Central Arizona Water Conservation District (CAWCD) regarding their Pima Mine Road recharge project. Although Corridor Alternative 7 is the Preferred Alternative that will be reaffirmed in the Final Tier 1 EIS/Record of Decision document, these concerns will be considered as part of the evaluation of future Tier 2 studies.

We will continue to coordinate with BOR as the project moves forward to future Tier 2 studies. Thank you again for your interest and participation in the Sonoran Corridor project. If you need any further information or assistance, please contact Tremain Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremain.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

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Civil Rights/Realty Specialist

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Nichole Olsker, BOR
Austin Nunez, TON-SXD
Velma Begay, TON-SXD
Tom Fitzgerald, CAWCD
Carlos Lopez, ADOT
Samuel Patton, ADOT

Department of Interior – US Fish and Wildlife Service



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Sonoran Corridor Tier 1 EIS
Comment Letter Response

Robert Lehman, Biologist
Department of Interior
US Fish and Wildlife Service
9828 North 31st Avenue, #C3
Phoenix, AZ 85051-2517

RE: 20/0470
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 Mr. Lehman,

Thank you for U.S. Fish and Wildlife Service (FWS) comments on the Sonoran Corridor Tier 1 Draft Environmental Impact Statement (DEIS) in a Department of Interior (DOI) letter dated January 8, 2021 from Janet Whitlock, DOI Regional Environmental Officer. The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) appreciates FWS's participation as a Participating Agency on this study. FHWA and ADOT most certainly understands your agency's primary concern of protecting endangered and special status plant species. The project team has attempted to address FWS concerns on the Sonoran Corridor Tier 1 DEIS that were raised in the DOI letter. Detailed responses to FWS concerns are provided below. Additional FWS comments sent as an attachment to the DOI letter will be addressed in the Tier 1 Final EIS (FEIS)/Record of Decision (ROD) document accordingly. Lastly, a separate letter addressing the National Park Service (NPS) concerns was sent to Karen Skaar, NPS NEPA/External Review Coordinator.

Pima Pineapple Cactus (PPC)

We agree that the Pima Pineapple Cactus (*Coryphantha scheeri* var. *robustispina*) (PPC) will almost certainly be the most impacted of any other listed or candidate species potentially occurring in the study area. However, as demonstrated below, we believe that the Sonoran Corridor would not impact a substantial portion of the remaining PPC population and that impacts would be mitigatable.

Pima Pineapple Cactus Range-wide Population and Habitat

The January 8, 2021 DOI letter provides an estimate that the remaining PPC population is "probably under 8,000 individuals". However, available information suggests a population that is likely larger than 8,000 individuals.

The August 2018 PPC Recovery Plan and 5-Year Review Summary state that FWS *is aware of* roughly 8,000 individuals and 377,873 acres of habitat. This number of known individuals is based on surveys and Arizona Natural Heritage Program database records. Neither of these documents provide a range-wide population estimate that accounts for un-surveyed suitable habitat, presumably because PPC density is highly variable over seemingly suitable habitat. However, Appendix 1 of the 2018 Recovery Plan identifies 71 separate surveys conducted since 1985 that detected a total of 6,131 individuals over 105,786 acres surveyed, although it is acknowledged there may be minor overlap of individuals across surveys. Calculating PPC density for each survey, then averaging those densities yields an average density of 0.65 PPC per acre. Other available density estimates include:

- The 1993 Federal Register listing document citing minimum density estimates by Mills (1991) based on surveys near the Sierrita Mountain that range from 0.05 to 0.22 PPC per acre (USFWS 1993)
- Baker (2003) and McDonald (2005) range-wide density estimates of approximately 0.40 PPC per acre
- Flesch (2019) used a distance sampling method over 12 occupied locations throughout the PPC’s range to develop an estimate of 0.59 PPC per acre

Although PPC density is highly variable over seemingly suitable habitat, the density estimates above appear to be the best available information to arrive at an overall range-wide population estimate. Using this density range of 0.05 to 0.65 PPC per acre over the August 2018 Recovery Plan estimate of 377,873 acres of potential habitat yields a range-wide population of between 18,894 and 245,617 PPC.

It is acknowledged that FWS is aware of at least 1,837 individuals and tens of thousands of acres of habitat that have been lost, primarily due to development. It is also acknowledged that PPC are likely experiencing population declines due to habitat loss, drought, non-native plant species proliferation, and other threats.

Sonoran Corridor Estimated Direct Impacts on PPC

As stated in the Tier 1 DEIS, Alternative 7 is the Preferred Alternative. This means future Tier 2 studies will evaluate a specific 400-foot-wide alignment alternatives within that 2,000-foot-wide corridor area. This 400-foot-wide area is only 20% of the acreage of the 2,000-foot-wide corridor area. In addition, ground disturbance may not be required over the entire 400-foot-wide footprint being that may be an existing roadway already within the 2,000-foot-wide footprint. Below in Table 1 are the estimated direct impacts of a 400-foot-wide alignment alternative footprint within each of the three Tier 1 Corridor Alternatives for comparison.

Table 1 – Estimated Direct Impacts, 400-foot-wide Alignment Footprint

	Corridor Alternative 1	Corridor Alternative 7 (Preferred)	Corridor Alternative 8A
Potential Suitable Habitat Acreage within each 400-foot-wide Alignment Alternative (20% of 2,000-foot-wide Corridor)	655.9	851.2	903.8
Estimated Number of PPC within each 400-foot-wide Alignment Alternative	33 – 427	43 – 553	45 – 587

Using Density Estimate Range of 0.05 to 0.65 PPC/acre			
Percentage of Range-wide Estimates (18,894 PPC over 377,873 acres of Potential Habitat, or 245,617 PPC over 377,873 acres of Potential Habitat)	0.17%	0.23%	0.24%

From Table 1, a 400-foot-wide alignment alternative within Corridor Alternative 7 may directly impact approximately 0.23% of the estimated remaining PPC population and habitat, which is not a substantial portion of the remaining population or habitat as estimated above. Assuming Corridor Alternative 1 is likely to have less direct impacts than Corridor Alternative 7 because of a smaller construction footprint, the difference in impacts is 0.06%, which is also not substantial.

Sonoran Corridor Indirect Impacts on PPC

Indirect impacts, such as the potential for the Sonoran Corridor to contribute to non-native plant species proliferation in the study area, are more difficult to estimate. However, the Tier 1 EIS commits ADOT to long-term invasive species management efforts in the Sonoran Corridor in coordination with federal, state, Tribal, and local agencies and stakeholders. This is in addition to specific avoidance and minimization measures such as washing all construction equipment prior to entering/leaving the site and seeding with species native to the project vicinity.

Surveys and Mitigation Program

Given the nature of this Tier 1 study, PPC surveys were not conducted at this time, but as demonstrated above, the Preferred Alternative is not expected to impact a substantial portion of the remaining PPC population or habitat. The project team also believes that there is likely no substantial difference in direct impacts among the corridor alternatives. PPC surveys in some form will be completed during the Tier 2 process if necessary. This effort will involve coordination with FWS.

In addition, because the Sonoran Corridor is not expected to impact a substantial portion of the remaining PPC population or habitat, the project team believes that it will be possible to mitigate potential PPC losses during Tier 2. Tier 2 environmental studies will include specific mitigation strategies which may include things such as PPC conservation bank credits or mitigation lands. If PPC conservation bank credits or mitigation lands are not available for purchase, ADOT may consider other specific mitigation options during Tier 2 such as purchasing preservation areas adjacent to the right-of-way for PPC conservation and/or establishing preservation areas within right-of-way. This may be combined with pre-construction seed collection from any PPC occurring in the project limits, germinating the seed, and then placing the resulting PPC back into preservation areas within or near the right-of-way. Lastly, an environmental commitment to conduct preconstruction surveys for listed or sensitive species to help identify the appropriate mitigation strategy to offset losses to a particular species during the Tier 2 process has been included in the combined Tier 1 FEIS/ROD. Avoidance, minimization, and mitigation measures will be further refined during Section 7 of the Endangered Species Act (ESA) consultation with FWS at Tier 2.

Tumamoc Globeberry

This species does not currently receive protection under the ESA and is covered in the Tier 1 DEIS under Section 3.13.3 (Arizona Species of Greatest Conservation Need). Section 3.13.3.5

(Available Mitigation Measures for Arizona Species of Greatest Conservation Need) in the Tier 1 DEIS includes general commitments for these species that will be further refined during the Tier 2 process in coordination with stakeholder agencies. In addition, Section 3.13.1.5 (Available Mitigation Measures for general vegetation and wildlife) includes a commitment that ADOT would evaluate the Selected alignment during the Tier 2 process to determine general vegetation and wildlife habitat and species-specific survey needs during the Tier 2 process. That would include consideration of surveys for Tumamoc globeberry.

The Preferred Alternative: Corridor Alternative 7

We most certainly understand the conclusions arrived at by the FWS and the preference for Alternative 1 as the Preferred Alternative. In many respects, Corridor Alternative 1 would likely result in fewer impacts to biological resources compared to Corridor Alternatives 7 and 8A. However, the decision to continue to move forward with Alternative 7 as the Preferred Alternative was influenced by a variety of other factors. For example, the traversing through Tohono O’odham (TON) San Xavier District (SXD) allotted lands is one key element the project team had to consider as part of this Tier 1 study. The project team was in constant communication with the TON, SXD, and potentially affected Tribal Allottee land owners throughout the Tier 1 study in its entirety. Based on a survey and other efforts conducted by the project team, potentially affected Tribal Allottee land owners have not indicated an interest in the development of the Sonoran Corridor across their lands. Because tribal land is considered sovereign, this can be an impediment for the advancement and further evaluation of Corridor Alternative 1 because approval from Tribal Allottee land owners is needed.

Thank you for your time and continued assistance on this effort. If you need any further information, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, MPD, by phone at (602) 612-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

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By: Tremaine L. Wilson
Civil Rights/Realty Specialist

ecc:
Shawn Alam, DOI
Carlos Lopez, ADOT
Sam Patton, ADOT

References

- Baker, M. 2013. A demographic study of *Coryphantha robustispina* spp. *robustispina*. Progress report for the 2012 field season and final report for the study. Report for USDI Bureau of Reclamation, Grant No. R08AP32230, 60 pp.
- Flesch, A.D., et al. 2019. Application of distance sampling for assessing abundance and habitat relationships of a rare Sonoran Desert cactus. *Plant Ecology* 220:1029-1042.
- McDonald C.J. 2005. Conservation of the rare Pima pineapple cactus (*Coryphantha scheeri* var. *robustispina*): Recruitment after fires and pollination in the Altar Valley of southern Arizona. Master's Thesis. University of Arizona, Arizona.
- USFWS. 1993. Endangered and Threatened Wildlife and Plants; Determination of Endangered Status for the Plant Pima Pineapple Cactus (*Coryphantha scheeri* var. *robustispina*); Final Rule Federal Register 58(183):49875-49880.
- USFWS. 2018. Recovery Plan for *Coryphantha scheeri* var. *robustispina* (Pima pineapple cactus). US Fish and Wildlife Service, Southwest Region, Tucson, AZ.
- USFWS. 2018. Pima pineapple cactus (*Coryphantha scheeri* var. *robustispina*). 5-year Review. August 3, 2018.

U.S. Department of Interior - National Park Service



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September 24, 2021

In Reply Refer To:

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Sonoran Corridor Tier 1 EIS
Comment Letter Response

Karen Skaar
NEPA/External Review Coordinator, Regional Environmental Quality
U.S. Department of Interior
National Park Service Regional Office serving Regions 6, 7, and 8
12795 West Alameda Parkway
Denver, Colorado 80228

RE: 20/0470
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. Skaar:

This letter is in response to the National Park Service (NPS) comments on the Sonoran Corridor Tier 1 Draft Environmental Impact Statement (DEIS) that were included in a Department of Interior (DOI) letter dated January 8, 2021 from Janet Whitlock, DOI Regional Environmental Officer. The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) appreciates NPS's participation as a Participating Agency on this study. Most importantly, FHWA and ADOT understands NPS's concerns on the Sonoran Corridor project and have attempted to address those concerns. Below are responses to the NPS concerns on the Sonoran Corridor Tier 1 DEIS that were raised in the DOI letter. Additional NPS comments sent as an attachment to the DOI letter will be addressed in the Tier 1 Final EIS (FEIS)/Record of Decision (ROD) document accordingly. Lastly, a separate letter addressing U.S. Fish and Wildlife Service (USFWS) concerns was sent to Bob Lehman, the USFWS Transportation Liaison.

National Park Service (NPS) Section 4(f) Comments

FHWA and ADOT recognizes and understands how important it is to preserve all relevant elements of the Anza National Historic Trail (NHT). We also acknowledge NPS's request for FHWA and ADOT to describe and analyze impacts the Sonoran Corridor will have on the Anza NHT as it pertains to Section 4(f) of the U.S. Department of Transportation Act of 1966 (Section 4(f)) during the Tier 1 study. As stated in Section 3.7 of the Sonoran Corridor Tier 1 DEIS, preliminary Section 4(f) approvals were not made during the Tier 1 study and more in-depth Section 4(f) analyses will occur during Tier 2 when specific project level 400-ft wide alignments are identified. In accordance with 23 Code of Federal Regulations (CFR) 774.7(e), Section 4(f)

approvals may involve different levels of detail where the Section 4(f) involvement is addressed in a tiered EIS.

From a historic perspective, our analysis and review of cultural resources records also acknowledges that Congress designated the trail alignment in 1990 under the National Trail System Act (104 STAT 429) to commemorate a historic event, the de Anza expedition. However, based on our records the Anza NHT has not been identified as a historic property that is included in, or eligible for inclusion, in the National Register of Historic Places (NRHP) as defined by 36 CFR 800.16(l)(1). Also, our records review indicates that no trail segments associated with the de Anza expedition have been identified within any of the Tier 1 corridor alternatives. This finding was substantiated by a review of the Anza NHT Comprehensive Management and Use Plan (CMUP), which shows that all historic trail segments and associated sites, such as the Punta del los Llanos trailhead and Campsite number 17, lie outside the Tier 1 corridor alternatives. It is important to note that this finding is preliminary and not final. The final determination of Anza NHT's NRHP eligible status will be made during further consultation under Section 106 of the National Historic Preservation Act (NHPA) with consulting parties, such as the Arizona State Historic Preservation Officer (SHPO) and NPS-Juan Bautista de Anza NHT, during Tier 2 when project effects on a resource's historic integrity are determined. This was explained in more detail in Section 3.6 of the Tier 1 DEIS. Furthermore, the NPS-Juan Bautista de Anza NHT is a concurring party on the Tier 1 Section 106 Programmatic Agreement (PA). The Tier 1 Section 106 PA outlines a standard process for the identification, evaluation, and treatment of historic properties during Tier 2. The Final Tier 1 Section 106 PA was executed on August 24, 2021 and filed with the Advisory Council on Historic Properties (ACHP) on September 8, 2021. The executed Tier 1 Section 106 PA and an ACHP acknowledgement letter of the executed PA dated September 9, 2021 will be included in the Tier 1 FEIS/ROD document.

From a recreational perspective, the Anza NHT is included in Table 3-28 of the Tier 1 DEIS. Table 3-28 list all properties within the corridor alternatives that are to be afforded protection under Section 4(f) during the Tier 2 stage. Potential impacts the Sonoran Corridor could have on Section 4(f) properties and whether those impacts could have a bearing on the decision to be made are discussed in Section 3.7.7.2 of the Tier 1 DEIS in accordance with 23 CFR 774.7(e)(1). In regards to the Anza NHT, it is noted that a future 400-ft wide alignment would only occupy 0.7% of the trail, and that grade-separated alignment options within the Preferred Alternative corridor area that completely avoid use of the Anza NHT would be considered during Tier 2. A further explanation of this can be found in Section 3.7.7.2 of the Tier 1 DEIS.

As previously stated, more in-depth Section 4(f) analyses and required coordination with applicable Officials with Jurisdiction to avoid or minimize potential impacts to Section 4(f) properties will occur during Tier 2. Also, it should be noted that a Section 4(f) environmental commitment to coordinate with NPS, Pima County and other local entities to identify appropriate strategies that will minimize impacts to the Anza NHT during Tier 2 will be included in the Tier 1 FEIS/ROD document.

Juan Bautista De Anza National Historic Trail (Anza NHT)

In the DOI letter dated January 8, 2021, NPS stated that they would like to collaborate with FHWA and ADOT to ensure all corridor alternatives, including the Preferred Alternative, to promote safe and accessible passage for pedestrians, bicycles, and equestrians (through collaboration with the Pima County Office of Sustainability, the City of Tucson, Farmers Investment Company, and the Anza Trail Coalition of Arizona, and other community groups). FHWA and ADOT agrees with NPS that such collaboration is necessary but during Tier 2, so an

environmental commitment to coordinate with NPS and local entities during Tier 2 to ensure impacts to the Anza NHT are minimized is included in the Tier 1 FEIS/ROD document. As mentioned above, there is opportunity to consider specific 400-ft wide alignments during Tier 2 that are grade-separated from the Anza NHT that would allow for a safe and accessible passage for pedestrians, bicycles, and equestrians along the trail.

Considering the Tier 1 EIS study evaluated broad-scale 2,000-ft-wide corridors that will be reduced to 400-ft or less specific alignments during Tier 2, the project team feels that a visual impact analysis (VIA) isn't appropriate because specific details of future 400-ft wide alignments within the Tier 1 corridor areas aren't known at this time. VIAs and other detailed studies and analyses will be conducted and completed during Tier 2. Similarly, project features to address any potential disturbances to the Anza NHT such as landscaping with native species or interpretative materials will also be discussed and evaluated during Tier 2.

The landscape features of the Anza NHT within the study area are dominated by undeveloped fairly flat natural Upper Sonoran Desert landscape which is crossed by Interstate 19, Nogales Highway, and the Union Pacific Railroad. There are several washes and a river which intersect the corridor alternatives and could affect the landscape features in and around the Anza NHT. In addition, existing agricultural uses are either adjacent to or within portions of the corridor alternatives. Other existing elements include existing sparsely developed rural/residential housing and overhead utility transmission lines, poles, and towers crossing or running parallel to the corridor alternatives. Distant background views from the trail of several landforms such as Black Mountain, the Rincon Mountains, the Santa Catalina Mountains, the Sierrita Mountains, and the Tucson Mountains are also part of the landscape context of the Anza NHT. These have been recognized as features of the study area environment and any effects of the corridor on the Anza NHT experience related to them will be further developed once a specific corridor alignment is determined in a Tier 2 analysis.

In conclusion, we appreciate the offer of collaboration as the project is further studied and the Anza NHT Recreational Retracement Route is correctly identified and evaluated as it pertains to a specific project alignment with more defined effects. NPS provided an updated shapefile of the Anza NHT on 02/08/2021. The file was compared to what was presented in Figure 3-24 of the Tier 1 DEIS, and the project team has determined that no changes to the to this portion of the Tier 1 DEIS are required. As requested, a specific reference to the Anza NHT CMUP has been added to *Section 3.2.3.1 Land Management and Special Designated Lands*.

Saguaro National Park

Although the Saguaro National Park is located about 16 miles from its closet point to the Sonoran Corridor's study area, the Preferred Alternative that was identified in the Sonoran Corridor Tier 1 DEIS has the potential to align with the Interstate 11 (I-11) Nogales to Wickenburg project. FHWA and ADOT understands NPS's concerns in regard to air quality impacts the two projects will have on the Saguaro National Park. The potential I-11 project was acknowledged and evaluated in Section 3.20 of the Tier 1 DEIS as a reasonably foreseeable future action. Trends in air quality that could be created by the Sonoran Corridor, along with other current and reasonably foreseeable actions, were discussed in Section 3.20 as well. Also, a general discussion on air quality impacts on the study area is included in Section 3.9 of the Tier 1 DEIS.

At the moment, FHWA and ADOT cannot commit to a quantitative air quality analysis of impacts during Tier 1 because Tier 2 project specifics aren't known at this time, and the criteria and procedures for determining air quality conformity for transportation projects are established by the U.S Environmental Protection Agency's (EPA) transportation conformity rule. EPA's rule requires transportation conformity at a regional level, and if applicable, at a project level before any transportation project is approved for federal funding. First, the Pima Association of Government's (PAG) is the agency responsible for demonstrating regional conformity in their Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP). The Sonoran Corridor is not included in the PAG's current RTP and TIP. Next once funding is identified and allocated in PAG's TIP for a Tier 2 project, any applicable project level air quality conformity determination analysis will be conducted and included in the Tier 2 NEPA document in accordance with EPA's transportation conformity rule. Transportation conformity was explained in more detail in Section 3.9.1.2 of the Sonoran Corridor Tier 1 DEIS.

Lastly, the NPS requested a meeting with FHWA and ADOT to gain a better understanding of the connectivity between the Sonoran Corridor and the potential I-11 project. The I-11 project team followed up with NPS via telephone conversation, and it was mutually decided that a meeting with NPS, FHWA and ADOT to discuss potential air quality impacts isn't necessary at this time.

Request for GIS Data

An email request from you for GIS information of the corridor alternatives has been responded to with the appropriate files. We hope they are useful. Please let us know if there is anything else that would assist in understanding the project.

We look forward to coordinating with NPS as the Tier 1 study moves forward and future Tier 2 projects are developed and evaluated. Thank you again for your interest and participation in the Sonoran Corridor project. If you need any further information or assistance, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

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By: Tremaine L. Wilson
Civil Rights/Realty Specialist

ecc:
Shawn Alam, DOI
Carlos Lopez, ADOT
Sam Patton, ADOT

Arizona Game and Fish Department



U.S. Department
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Comment Letter Response

Raul Vega
Supervisor Tucson Region
Arizona Game and Fish Department
555 N. Greasewood Road
Tucson AZ 85745

RE: Sonoran Corridor Tier 1 Environmental Impact Statement

Dear Mr. Vega:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) appreciates the Arizona Game and Fish Department (AGFD) ongoing participation as a Cooperating Agency in the Sonoran Corridor Tier 1 Environmental Impact Statement (EIS) study. Recognizing the critical nature of preserving the natural environment in the context of the project, AGFD specific comments on the Tier 1 Draft EIS and proposed mitigation strategies for Tier 2 analyses will be addressed in the Final Tier 1 EIS as part of the Errata section of the document.

FHWA and ADOT most certainly understand the AGFD preference for Alternative 1 based on the evaluation of the potential impact of the project on wildlife and their habitat. There were many factors the project team had to consider in determining the study's Preferred Alternative, such as Alternative 1 traversing through the Tohono O'odham (TON) San Xavier District (SXD) allotted land. That was one key difference between the corridor alternatives that were evaluated in the Tier 1 Draft EIS. The project team had been in constant communication with the TON, SXD, and potentially affected Tribal Allottee landowners throughout the entire Tier 1 study. Based on a survey and other efforts conducted by the project team, potentially affected Tribal Allottee landowners have not indicated an interest in the development of the Sonoran Corridor across their lands. Because TON-SXD allotted land is considered sovereign nation, the project team needed consent from Tribal Allottee landowners before Alternative 1 could be advanced into Tier 2.

Lastly, we will continue to look for AGFD guidance as the project evolves and moves into Tier 2. We also appreciate the offer of a collaborative effort and AGFD's in-house expertise going forward as future detailed Tier 2 analyses are conducted.

Thank you again for your interest and participation in the Sonoran Corridor Tier 1 EIS study. If you need any further information or assistance, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

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By: Tremaine L. Wilson
Civil Rights/Realty Specialist

cc:
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Tohono O’odham Nation



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Chairman Ned Norris, Jr.
Tohono O’odham Nation
P.O. Box 837
Sells, AZ 85634

RE: Draft Sonoran Corridor Tier 1 Environmental Impact Statement Letter (dated: 01/08/21)

Dear Chairman Norris,

Thank you for the letter dated January 8, 2021 expressing interest and input concerning the Draft Sonoran Corridor Tier 1 Environmental Impact Statement (Draft Tier 1 EIS). Tohono O’odham Nation’s (TON) recommendation of retaining Alternative 1 for a future joint analysis with Alternative 7, along with other concerns, was noted by the project team. Also, the project team understands the importance of the Sonoran Corridor and how it could benefit the TON-San Xavier District (SXD).

After considering information that is currently available to the project team, the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) intend to move forward with just Alternative 7 as the Selected Alternative in the combined Final Tier 1 EIS/Record of Decision (ROD) document. Although Alternative 1 was identified as a high rated alternative in the Corridor Selection Report, Alternative 7 performed better in terms of meeting the study’s Need and Purpose as shown in Table ES-3 and Table 5-1 of the Draft Tier 1 EIS. In addition, there were other factors the project team had to consider in determining the study’s Preferred Alternative such as **potentially affected Tribal Allottee landowners not having an interest in the development of the Sonoran Corridor across their lands**. This is in correlation with outreach that was conducted with Tribal Allottee landowners and survey response the project team received back. The project team needed consent from Tribal Allottee landowners in order to advance Alternative 1 into Tier 2.

Lastly, please be aware that although Alternative 7 has been identified as the Selected Alternative, that does not prevent other transportation opportunities across TON-SXD lands or the reevaluation of this study in accordance with 23 Code of Federal Regulation (CFR) 771.129 if circumstances were to change in the future.

Thank you again for your interest and participation in the Sonoran Corridor Tier 1 EIS study. Please continue to offer insights as the Sonoran Corridor study moves forward into Tier 2 studies.

If you need any further information or assistance, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

TREMAINE LUMUSS WILSON  Digitally signed by TREMAINE LUMUSS
WILSON
Date: 2021.09.16 13:42:43 -07'00'

By: Tremaine L. Wilson
Civil Rights/Realty Specialist

cc:
Carlos Lopez, ADOT
Samuel Patton, ADOT
Mark Pugh, San Xavier District

Arizona State Land Department



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

ARIZONA DIVISION

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September 24, 2021

In Reply Refer To:

410-A(BFI)
TRACS No. 410 PM 0.0 P9100 05P
Sonoran Corridor Tier 1 EIS
Comment Letter Response

Mark Edelman, AICP
Director
Arizona State Land Department
Planning & Engineering Division
1616 West Adams, Phoenix, AZ 85007

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

Dear Mr. Edelman:

The project team appreciates the supportive comments from the Arizona State Land Department (ASLD) regarding the Sonoran Corridor Tier 1 Draft Environmental Impact Statement (EIS) in a letter dated January 8, 2021. Given the Sonoran Corridor's potential effects on Arizona State Trust lands, ASLD's participation as a Participating Agency in this study has been very important to the project team.

Your concurrence with our decision to identify Corridor Alternative 7 as the Preferred Alternative has been noted. We will continue to coordinate with ASLD as the project moves forward into future Tier 2 studies.

Thank you again for your interest and participation in the Sonoran Corridor project. If you need any further information or assistance, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

TREMAINE LUMUSS WILSON

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WILSON
Date: 2021.09.20 08:08:25 -07'00'

By: Tremaine L. Wilson
Civil Rights/Realty Specialist

ecc:

Jim Perry, ASLD

Jon Froke, ASLD

Carlos Lopez, ADOT

Samuel Patton, ADOT

Pima County



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September 24, 2021

In Reply Refer To:

410-A(BFI)
TRACS No. 410 PM 0.0 P9100 05P
Sonoran Corridor Tier 1 EIS
Comment Letter Response

Mr. C.H. Huckleberry, County Administrator
County Administrator's Office
Pima County Governmental Center
130 W. Congress. Floor 10
Tucson, AZ 85701

RE: Sonoran Corridor Tier 1 Environmental Impact Statement

Dear Mr. Huckleberry:

Thank you for Pima County's comments and participation as a Participating Agency in the Sonoran Corridor Tier 1 Draft Environmental Impact Statement (DEIS). Pima County's leadership and experience on this effort has been an invaluable source of helpful information that has benefitted the project immeasurably. Consideration has been given to all the major points raised in your letter. Also, the detailed comments made by Pima County staff on Chapter 3 will be addressed in the combined Tier 1 FEIS/Record of Decision document. Appropriate changes will be made to the Tier 1 DEIS and will be included in the errata section of the Tier 1 Final EIS.

The project team understands Pima County's interest in Alternative 1. Although Alternative 1 was identified as a high rated alternative in the Corridor Selection Report, Alternative 7 performed better in terms of meeting the study's Need and Purpose as shown in Table ES-3 and Table 5-1 of the Draft Tier 1 EIS. In addition, there were other factors the project team had to consider in determining the study's Preferred Alternative such as Alternative 1 traversing through the Tohono O'odham (TON) San Xavier District (SXD) land, which is one key difference between corridor alternatives that were evaluated in the Tier 1 DEIS. The project team had been in constant communication with the TON, SXD, and potentially affected Tribal Allottee landowners throughout the Tier 1 study in its entirety. Based on a survey response and other efforts conducted by the project team, potentially affected Tribal Allottee landowners have not indicated an interest in the development of the Sonoran Corridor across their lands. The project team needed consent from Tribal Allottee landowners in order to advance Alternative 1 into Tier 2. In conclusion, Corridor Alternative 7 is the Preferred Alternative after considering the Tier 1 analysis conducted and information collected by the project team

Lastly, please be aware that although Alternative 7 has been identified as the Preferred Alternative, that does not prevent other transportation opportunities across TON-SXD lands or the reevaluation of this Tier 1 study in accordance with 23 Code of Federal Regulation (CFR) 771.129 if circumstances were to change in the future.

Thank you again for your interest and participation in the Sonoran Corridor project. We will continue to look for the involvement and guidance from Pima County as the project evolves and moves into Tier 2. If you need any further information or assistance, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

TREMAINE LUMUSS WILSON

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WILSON
Date: 2021.09.16 13:40:55 -07'00'

By: Tremaine L. Wilson
Civil Rights/Realty Specialist

cc:

Dr. John Moffatt, Economic Development Director
Carmine DeBonis, Jr, Deputy County Administrator for Public Works
Yves Khawam, PhD, Assistant County Administrator for Public Works
Ana Olivares, Director, Transportation Department
Carlos Lopez, ADOT
Samuel Patton, ADOT

City of Tucson



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

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September 24, 2021

In Reply Refer To:

410-A(BFI)
TRACS No. 410 PM 0.0 P9100 05P
Sonoran Corridor Tier 1 EIS
Comment Letter Response

Michael J. Ortega, P.E., City Manager
City of Tucson
Office of the City Manager
City Hall
255 W. Alameda
Tucson, AZ 85701

RE: Sonoran Corridor Tier 1 Environmental Impact Statement

Dear Mr. Ortega:

Thank you for your comments and the City of Tucson's (City) participation as a Participating Agency in the Sonoran Corridor Tier 1 Draft Environmental Impact Statement (DEIS). The City's participation in this effort has been an invaluable source of helpful information that has greatly benefitted the project.

The Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) has noted the City's support of advancing either Alternative 1 or Alternative 7. The project team also most certainly understands the City's concerns on Alternative 7 but impacts likely to be caused by Alternative 7 can be mitigated during Tier 2, and although Alternative 1 was identified as a high rated alternative in the Corridor Selection Report, Alternative 7 performed better in terms of meeting the study's Need and Purpose as shown in Table ES-3 and Table 5-1 of the Draft Tier 1 EIS. In addition, there were other factors the project team had to consider in determining the study's Preferred Alternative such as Alternative 1 traversing through the Tohono O'odham (TON) San Xavier District (SXD) land, which is one key difference between corridor alternatives that were evaluated in the Tier 1 DEIS. The project team had been in constant communication with the TON, SXD, and potentially affected Tribal Allottee landowners throughout the Tier 1 study in its entirety. Based on a survey response and other efforts conducted by the project team, potentially affected Tribal Allottee landowners have not indicated an interest in the development of the Sonoran Corridor across their lands. The project team needed consent from Tribal Allottee landowners in order to advance Alternative 1 into Tier 2. In conclusion, Corridor Alternative 7 is the Preferred Alternative after considering the Tier 1 analysis conducted and information collected by the project team.

We will continue to look for guidance from the City as the project evolves and moves into Tier 2. Thank you again for your interest and participation in the Sonoran Corridor project. If you need any further information or assistance, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

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Date: 2021.09.16 13:38:42 -07'00'

By: Tremaine L. Wilson
Civil Rights/Realty Specialist

ecc:
Carlos Lopez, ADOT
Sam Patton, ADOT

Tucson Airport Authority



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

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September 24, 2021

In Reply Refer To:

410-A(BFI)
TRACS No. 410 PM 0.0 P9100 05P
Sonoran Corridor Tier 1 EIS
Comment Letter Response

Danette M. Bewley, A.A.E.,
President/CEO
Tucson Airport Authority
7250 S. Tucson Blvd, Ste 300
Tucson, AZ 85756

RE: Sonoran Corridor Tier 1 Draft Environmental Impact Statement

Dear Ms. Bewley:

Thank you for the Tucson Airport Authority's (TAA) ongoing participation as a Participating Agency in the Sonoran Corridor study, and TAA comments on the Draft Tier 1 Environmental Impact Statement (EIS). The project team has noted your support of Corridor Alternative 7 as the Preferred Alternative.

The project team acknowledges TAA's request for the Arizona Department of Transportation (ADOT) to include an evaluation of the Tucson Electric Power (TEP)/ Western Area Power Administration (WAPA) Vail to Tortolita Transmission Lines Project in the Sonoran Corridor Tier 1 EIS study. The project team has recently met with TEP and WAPA to understand the proposed transmission lines configuration project, and it has been determined that the 2000-foot width of the Preferred Alternative, Corridor Alternative 7, allows for flexibility during future planning during Tier 2 and can readily accommodate the 150-foot width of the utility corridor that is envisioned by TEP and WAPA. ADOT will continue to coordinate with TEP and WAPA during Tier 2 studies of the Sonoran Corridor to address any effects on the proposed transmission lines.

Coordination with TAA will continue as the Sonoran Corridor Tier 1 EIS study moves forward into future Tier 2 studies. Thank you again for your interest and participation in the Sonoran Corridor project. If you need any further information or assistance, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

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Date: 2021.09.16 13:43:34 -0700

By: Tremaine L. Wilson
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ecc:
Mike Smejkal, TAA
Scott Robidoux, TAA
Carlos Lopez, ADOT
Samuel Patton, ADOT

Santa Cruz County



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September 24, 2021

In Reply Refer To:

410-A(BFI)
TRACS No. 410 PM 0.0 P9100 05P
Sonoran Corridor Tier 1 EIS
Comment Letter Response

Bruce Bracker,
Santa Cruz County, District 3
Santa Cruz County Complex
2150 N. Congress Drive
P.O. Box 1150
Nogales, Arizona 85621

RE: Sonoran Corridor Tier 1 Draft Environmental Impact Statement

Dear Mr. Bracker:

We very much appreciated the supportive comments from Santa Cruz County regarding the Sonoran Corridor Tier 1 Draft Environmental Impact Statement (EIS) in a letter dated December 1, 2020. The project team has noted the very compelling points made in the letter. The project team also believes the Sonoran Corridor is an important project that can be very beneficial for the Southern region of Arizona.

The project team has noted and understands your interest in Alternative 1. Although Alternative 1 was identified as a high rated alternative in the Corridor Selection Report, Alternative 7 performed better in terms of meeting the study's Need and Purpose as shown in Table ES-3 and Table 5-1 of the Draft Tier 1 EIS. In addition, there were other factors the project team had to consider in determining the study's Preferred Alternative such as Alternative 1 traversing through the Tohono O'odham (TON) San Xavier District (SXD) land, which is one key difference between corridor alternatives that were evaluated in the Tier 1 Draft EIS. The project team had been in constant communication with the TON, SXD, and potentially affected Tribal Allottee landowners throughout the Tier 1 study in its entirety. Based on a survey response and other efforts conducted by the project team, potentially affected Tribal Allottee landowners have not indicated an interest in the development of the Sonoran Corridor across their lands. The project team needed consent from Tribal Allottee landowners in order to advance Alternative 1 into Tier 2. In conclusion, Corridor Alternative 7 is the Preferred Alternative after considering the Tier 1 analysis conducted and information collected by the project team.

Please continue to offer insights as the Sonoran Corridor study moves forward into Tier 2 studies. Thank you again for your interest and participation in the Sonoran Corridor project. If you need any further information or assistance, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

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Sam Patton, ADOT

Tucson Electric Power



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September 24, 2021

In Reply Refer To:

410-A(BFI)
TRACS No. 410 PM 0.0 P9100 05P
Sonoran Corridor Tier 1 EIS
Comment Letter Response

Rence Darling
Transmission and Distribution Supervisor
Tucson Electric Power
88 East Broadway Blvd., Post Office Box 711
Tucson, Arizona 85702

RE: Sonoran Corridor Tier 1 Environmental Impact Statement

Dear Ms. Darling:

Thank you very much for your ongoing participation in the Sonoran Corridor study and review of the Draft Tier 1 Environmental Impact Statement (EIS). The Tucson Electric Power (TEP) comment regarding the proposed TEP and Western Area Power Administration (WAPA) transmission lines will be considered in the combined Sonoran Corridor Tier 1 Final EIS and Record of Decision document. The project team met with TEP and WAPA after release of the Draft Tier 1 EIS and it has been determined that the 2000-foot width of the Preferred Alternative can readily accommodate the 100-foot width of the utility corridor that is envisioned by TEP. The utility corridor location will be an important consideration in deciding on a final alignment for the new roadway during Tier 2. As you note, we did receive similar comments from the Tucson Airport Authority and the City of Tucson.

Thank you again for your interest and participation in the Sonoran Corridor project. We will continue to look for the involvement and guidance of TEP as the project evolves. We will be particularly diligent regarding TEP involvement as it relates to the coordination of the new roadway placement with the proposed power lines to avoid unduly infringing upon the transmission line corridor. If you need any further information or assistance, please contact Tremaine Wilson, FHWA Civil Rights/Realty Specialist, by phone at (602) 382-8970 or by email at tremaine.wilson@dot.gov; or Samuel Patton, ADOT Project Manager, by phone at (602) 712-6168 or by email at spatton@azdot.gov.

Sincerely,

Karla S. Petty
Division Administrator

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By: Tremaine L. Wilson
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Sam Patton, ADOT