



FEIS APPENDIX F – AGENCY AND PUBLIC COMMENTS ON THE DRAFT TIER 1 EIS AND ADOT RESPONSES

October 2021



U.S. Department of Transportation
Federal Highway
Administration

APPENDIX F – AGENCY AND PUBLIC COMMENTS ON THE DRAFT TIER 1 EIS AND ADOT RESPONSES

Agency Comments and Responses

Participating and Cooperating Agencies, as well as the general public, were notified of the Draft Tier 1 EIS availability on November 6, 2020 along with an invitation to comment by January 8, 2021. The project team received comments from 13 agencies and organizational stakeholders. Comment letters on the Draft Tier 1 EIS received from agencies and stakeholders can be found in Appendix D of this FEIS/ROD. Official response letters to commenting agencies are shown in Appendix E. ADOT's response to each agency comment is provided in the table below.

Agency	Comment	Response
Cooperating Agencies		
Bureau of Reclamation	<p>To Whom It May Concern:</p> <p>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.</p> <p>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."</p> <p>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.</p> <p>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:</p> <p>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</p> <p>Sonoran Corridor Tier One EIS Scoping Comments</p> <p>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.</p> <p>San Xavier District – Several groundwater wells.</p> <p>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 alterative.</p> <p>Should you have questions, please contact Ms. Nichole Olsker, Environmental Protection Specialist, at (480) 216-9914, or via email at nolsker@usbr.gov.</p> <p>Sincerely, Sean M. Heath Manager, Environmental Resource Management Division</p>	<p>Thank you for your comment. The requested corrections and revision have been made and presented in the errata element of the FEIS.</p>

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Environmental Protection Agency	<p>Dear Division Administrator Petty and Director Halikowski:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>2</p> <p>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.</p> <p>Sincerely, CONNEL DUNNIN For Jean Prijatel Manager, Environmental Review Branch</p>	Thank you for your comments and participation in the project.

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Arizona Game and Fish Department (AGFD)	<p>Dear Study Team:</p> <p>The Arizona Game and Fish Department (Department) has reviewed the Federal Highway Administration (FHWA)/Arizona Department of Transportation's (ADOT's) Draft Tier 1 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.</p> <p>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.</p> <p>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.</p> <p>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 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.</p> <p>The Department understands the need to balance a wide range of environmental concerns and 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.</p> <p>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 kleepening@azgfd.gov or 520-388-4447 if there are any questions or concerns regarding this letter.</p> <p>Sincerely, ? Raul Vega Supervisor, Tucson Region</p>	Thank you for your comments and participation in the project.

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AGFD	<p>Dear Study Team:</p> <p>The Arizona Game and Fish Department (Department) has reviewed the Federal Highway Administration (FHWA)/Arizona Department of Transportation's (ADOT's) Draft Tier 1 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.</p> <p>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.</p>	Thank you for your comments and participation in the project.
AGFD	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.	The DEIS includes a comment that ADOT would evaluate the preferred alignment during the Tier 2 process to determine general vegetation and wildlife habitat and species-specific survey needs during the Tier 2 process, which would include consideration of reptile surveys.
AGFD	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 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.	ADOT will continue working with AGFD on wildlife movement throughout the project development process.
AGFD	The Department understands the need to balance a wide range of environmental concerns and 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.	Comment noted
AGFD	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 or 520-388-4447 if there are any questions or concerns regarding this letter	ADOT will continue working with AGFD throughout the project development process.

Agency	Comment	Response
Participating Tribal Agencies		
Tohono O'odham Nation	<p>Dear Ms. Bradley and the Sonoran Corridor Tier 1 EIS Study Team:</p> <p>The Tohono O'odham Nation appreciates the opportunity to comment on the Sonoran Corridor Tier I 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Sincerely,</p> <p>Chairman Ned Norris, Jr. Tohono O'odham Nation</p>	<p>Thank you for your ongoing participation in the study. Based on the analyses completed and the participation of the various affected agencies and the public, including the Tohono O'odham Nation, the San Xavier District, the San Xavier District Allottee Association (who indicated opposition to Alternative 1 in their response letter), the selected alternative is Alternative 7. The Nation and District will continue to be included in any further analyses that may be completed should the project move forward into a Tier 2 NEPA study.</p>
Participating and Other Agencies		
Department of Interior	<p>Dear Ms. Petty:</p> <p>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). (Letter with multiple comments separate.)</p>	<p>Thank you for your comments and participation.</p>

Agency	Comment	Response
Department of Interior – National Park Service (NPS)	<p>NPS Section 4(f) Comments</p> <p>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.</p> <p>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 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).</p> <p>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.</p>	<p>Thank you for your comment. Considerations for the Juan Bautista de Anza National Historic Trail were included in the Section 4(f) analysis, as the trail is a recreational facility. The Juan Bautista de Anza National Historic Trail is not a historic property as defined by NHPA. Per review of the CMUP, no historic segments and sites are identified within the project alternative corridors. Section 106 consultation will continue through Tier 2. In addition, as stated in the 3.7.9 Consultation, coordination with applicable OWJ would occur for potential impacts to Section 4(f) properties. Thus, NPS and Pima County would be contacted for potential impacts to the Juan Bautista de Anza National Historic Trail.</p>
NPS	<p>Juan Bautista De Anza National Historic Trail</p> <p>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.</p> <p>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 Pimeria 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.</p>	<p>Thank you for your comment. FHWA and ADOT would be happy to coordinate with you to ensure the Anza NHT Recreational Retracement Route is correctly identified and evaluated. The trail depicted on the maps were plotted via Pima County and NPS GIS data available from 2019. A VIA cannot be prepared at this time as the preferred alternative has not been identified and the 2,000 -foot-wide corridor will be reduced to 400 feet, thus changing potential viewshed impacts, depending on placement. Additional studies and analysis will be completed under the Tier 2 study.</p>

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NPS	<p>Saguaro National Park</p> <p>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 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.</p> <p>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.</p>	<p>The potential I-11 project was acknowledged as a foreseeable future action and impact trends in air quality were discussed in Section 3.20 of the Draft Tier 1 EIS.</p> <p>A commitment during Tier 1 to conduct a quantitative air quality analysis during Tier 2 cannot be made because the criteria and procedures for determining air quality conformity for transportation projects are established by EPA's transportation conformity rule.</p> <p>The I-11 project team followed up with NPS via telephone conversation, and it was mutually decided that a meeting was no longer required.</p>
Department of Interior – United States Fish & Wildlife Service (USFWS)	<p>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.</p> <p>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.</p> <p>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.</p>	<p>See responses to resource-specific comments below.</p>
USFWS	<p>FWS General Comments</p> <p>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 (<i>Coryphantha scheeri</i> var. <i>robustispina</i>) (PPC) and Tumamoc globeberry (<i>Tumamoca macdougalii</i>), 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 (<i>Gopherus morafkai</i>) (SDT), a candidate species; however, the DEIS lists an impressive number of planned mitigation measures for SDT, and FWS will have no more to say about the species beyond what is in the matrix (see comments 11, 17, and 18).</p>	<p>See responses to resource-specific comments below.</p>

Agency	Comment	Response
USFWS	<p>Pima Pineapple Cactus</p> <p>FWS emphasizes the following key points from the extensive comments in the matrix (comment 13):</p> <ul style="list-style-type: none">• 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.	<p>ADOT/FHWA agree that PPC will almost certainly be the most impacted of any other listed or candidate species potentially occurring in the study area. However, as provided in our response letter in Appendix E, we believe that the Sonoran Corridor would not impact a substantial portion of the remaining PPC population and that impacts would be mitigatable as provided below. Therefore, we believe PPC surveys of all Tier 1 corridor alternatives are unnecessary, and that a preferred corridor alternative can be selected without conducting PPC surveys. Surveys in some form will be completed prior to the Tier 2 process in coordination with FWS. Additional information regarding PPC is provided in the FEIS.</p>
USFWS	<p>Tumamoc Globeberry</p> <p>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.</p>	<p>This FEIS and ROD include a commitment that ADOT would evaluate the preferred alignment during the Tier 2 process to determine general vegetation and wildlife habitat and species-specific survey needs during the Tier 2 process, which would include consideration of Tumamoc Globeberry.</p>
USFWS	<p>Other Special Status Species and Managed Lands for Wildlife</p> <p>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.</p>	<p>ADOT/FHWA does not have control over lands that are not within Right-of-Way but have been and will continue coordinating with City of Tucson, Pima County, Arizona Game and Fish Department, TON and other stakeholders regarding the project</p>
USFWS	<p>The Preferred Alternative: Corridor Alternative 7</p> <p>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 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.</p> <p>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 <i>T. maddougali</i>, the Tumamoc globeberry, within the corridor alternative is entirely unknown.</p>	<p>Comment noted.</p>
USFWS	<p>Corridor Alternative 1</p> <p>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.</p>	<p>Comment noted.</p>

Agency	Comment	Response
USFWS	<p>FWS Conclusions</p> <ul style="list-style-type: none">• 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.	As provided in responses to previous comments, additional information regarding PPC, Tumamoc globeberry, and Sonoran Desert tortoise is provided in the FEIS.
USFWS	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.	See responses to resource-specific comments above.
Karen Skaar, NPS	<p>Hello,</p> <p>I am inquiring on behalf of the NPS regarding the Sonoran Corridor DEIS. Is there any chance you have a shapefile of the proposed alignment to share?</p> <p>https://azdot.gov/planning/transportation-studies/sonoran-corridor-tier-1-environmental-impact-statement/contact-us</p> <p>Karen Skaar (née Frankenfeld) NEPA/External Review Coordinator, Regional Environmental Quality National Park Service Regional Office Serving Department of Interior Regions 6, 7, 8 12795 West Alameda Parkway, Denver, CO 80228 NEW CELL (303) 349-4160 karen_frankenfeld@nps.gov IMR-EQ SharePoint Site</p> <p>"Plans to protect air and water, wilderness and wildlife, are in fact plans to protect Man." -Stewart Udall</p>	Shapefiles have been provided as requested.

Agency	Comment	Response
Pima County	<p>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:</p> <ol style="list-style-type: none">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 UA Arizona Technology and Innovation Park at Rita Road and Pima County's South east Employment and Logistics Center at the Fairgrounds;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. <p>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.</p> <p>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.</p> <p>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.</p>	<p>Thank you for your comments and participation. Consideration has been given to all the major points raised in your letter. At this time, the TON San Xavier District allottee property owners have not indicated an interest in the development of the Sonoran Corridor across their lands. As they are an independent sovereign nation, this is an impediment to further analysis of Corridor Alternative 1. This does mean that a future project cannot evaluate Corridor Alternative 1. Based on the Tier 1 EIS analysis, Corridor Alternative 7 is the Preferred alternative.</p> <p>As a clarification to the findings, it is clear that the most productive segment of the corridor is that between Alvernon Way and I-10. This would be a logical first phase for implementation of the Sonoran Corridor. It has mitigable impacts, and connects the areas of greatest demand, both now and in the future. The study recognized the existence and anticipated growth near the UA Tech Park and the Fairgrounds, and accounted for that in the analysis. The same is true with the TEP substation. The study team met with TEP to discuss the most appropriate location for the corridor given the substation plans. The 2,000-foot corridor accommodates that feature.</p> <p>Comments made on Chapter 3 have been addressed and all appropriate changes made in the errata version of the Final EIS/Record of Decision.</p>

Agency	Comment	Response
Pima County	<p>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:</p> <p>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;</p> <p>2. Active development of the U of Arizona Technology and Innovation Park at Rita Road and Pima County's South east Employment and Logistics Center at the Fairgrounds;</p> <p>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;</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Thank you for your comments and participation. Consideration has been given to all the major points raised in your letter. At this time, the TON San Xavier District allottee property owners have not indicated an interest in the development of the Sonoran Corridor across their lands. As they are an independent sovereign nation, this is an impediment to further analysis of Corridor Alternative 1. This does mean that a future project cannot evaluate Corridor Alternative 1. Based on the Tier 1 EIS analysis, Corridor Alternative 7 is the Preferred alternative.</p> <p>As a clarification to the findings, it is clear that the most productive segment of the corridor is that between Alvernon Way and I-10. This would be a logical first phase for implementation of the Sonoran Corridor. It has mitigable impacts and connects the areas of greatest demand, both now and in the future. The study recognized the existence and anticipated growth near the UA Tech Park and the Fairgrounds and accounted for that in the analysis. The same is true with the TEP substation. The study team met with TEP to discuss the most appropriate location for the corridor given the substation plans. The 2,000-foot corridor accommodates that feature. Lastly, Corridor Alternative 7 was the highest scoring alternative, though Corridor Alternative 1 also performed well. We will address the comments made on Chapter 3 and make all appropriate changes in the errata version of the Final EIS/Record of Decision.</p>
Pima County	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".	Revisions made.
Pima County	2. Page 3-66, Section 3.6.2, Methodology, 1st 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.	Revisions made.
Pima County	3. Page 3-66, Section 3.6.2, Methodology, 1st 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.	Revisions made.
Pima County	4. Page 3-66, Section 3.6.2.1, 5th 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?	Revisions made.
Pima County	5. Page 3-67, Section 3.6.2.3, 4th paragraph: This paragraph contains a typo: "While the determination of effects on cultural resources is not being ? at this time."	Revisions made.

Agency	Comment	Response
Pima County	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.	Revisions made.
Pima County	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.	Revisions made.
Pima County	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.	The FEIS references habitat fragmentation/wildlife movement related impacts for game species.
Pima County	<p>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).</p> <p>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.</p> <p>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.</p>	The FEIS includes more detail regarding indirect impacts, but specific commitments, such as the need to limit night lighting, will be addressed during the Tier 2 process.

Agency	Comment	Response
Pima County	<p>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 more limited 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.</p> <p>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).</p> <p>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</p> <p>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.</p>	<p>The FEIS includes more detail regarding this species. The FEIS and ROD include a commitment to coordinate and partner with State and Federal agencies and other interested parties to incorporate project design features, where warranted, to minimize SDT habitat fragmentation. Specific design commitments will be developed during the Tier 2 process.</p>
Pima County	<p>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.</p> <p>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 <i>Diadasia</i> are dependent upon other species of cactus to provide floral resources outside of the very narrow period of time that PPC flower.</p> <p>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.</p>	<p>The FEIS includes more detail regarding PPC, and the DEIS and FEIS include a commitment to long-term invasive species management within the Sonoran Corridor. Specific PPC mitigation commitments will be developed during the Tier 2 process in coordination with FWS and other project stakeholders.</p>

Agency	Comment	Response
Pima County	<p>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 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.</p> <p>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.</p>	<p>The FEIS includes more detail regarding Swainson's hawk. Specific commitments such as raptor nest avoidance areas will be considered during the Tier 2 process.</p>
Pima County	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Revised to include more detail regarding Tumamoc globeberry. The DEIS includes a commitment that ADOT would evaluate the preferred alignment during the Tier 2 process to determine general vegetation and wildlife habitat and species-specific survey needs during the Tier 2 process, which would include consideration of Tumamoc globeberry.</p>

Agency	Comment	Response
Pima County	<p>14. Page 3-169, Table 3-45, Mesquite mouse: This species (<i>Peromyscus merriami</i>), 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.</p> <p>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 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.</p> <p>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.</p>	Consideration of potential effects on the Mesquite mouse will be undertaken as part of the Tier 2 process that follows completion of the Tier 1 EIS process
Pima County	<p>15. Page 3-169, Table 3-45, Sinaloan narrow-mouthed toad: This species (<i>Gastrophryne mazatlanensis</i>) is not included in the draft Tier 1 EIS, but was recently recognized as distinct from the western narrow-mouthed toad (<i>Gastrophryne olivacea</i>) 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.</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>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.</p>	Consideration of potential effects on the Sinaloan narrow-mouthed toad will be undertaken as part of the Tier 2 process that follows completion of the Tier 1 EIS process

Agency	Comment	Response
Pima County	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.	The FEIS includes more detail regarding the species that may use R22.
Pima County	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.	No revision necessary, any wildlife movement actions along I-19 would be separate project(s).
Pima County	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."	No revision necessary, will continue to work with stakeholders
Pima County	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 ≥ 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. 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).	ADOT/FHWA will carry forward specific measures suggested by agencies for consideration during the Tier 2 process.

Agency	Comment	Response
City of Tucson	<p>Dear Sonoran Corridor Tier 1 EIS Study Team:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Sincerely,</p> <p>Michael J. Ort P.E. City Manager</p>	<p>Thank you for your comments and participation in the project.</p>

Agency	Comment	Response
Tucson Airport Authority	<p>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.</p> <p>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.</p> <p>Please contact me if you have any questions or concerns regarding this correspondence. I can be reached by email at dbewley@flytucson.com or by telephone at 520-573-8100.</p> <p>Best regards,</p> <p>Danette M. Bewley, A.A.E., President/CEO</p>	<p>Thank you for your comment. We have updated and modified the reference to the 230 kV Vail to Tortolita Transmission Line in the EIS. Regarding the location of the future roadway, the 2,000-foot corridor is designed to afford the opportunity to shift the final roadway right-of-way (expected to be no more than 400 feet) within the larger corridor to accommodate potential conflicts such as the one noted in your letter. The project has taken account of the TEP project and the mining operations and can provide the needed space for implementation or retention. The final roadway alignment will be defined in a future Tier 2 analysis that will ensure minimal impact to other features in the affected area.</p>
Santa Cruz County	<p>Santa Cruz County Board of Supervisors Letter of Support (PDF)</p> <p>Director Halikowski,</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Thank you very much for your consideration.</p>	<p>Thank you for your comment.</p>

Agency	Comment	Response
Tucson Electric Power	<p>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 Corridor Alternative 7 (Preferred Alternative) and Corridor 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.</p> <p>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.</p> <p>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.</p> <p>Thank you for your time and consideration of the comment.</p> <p>Warm regards, Renee Darling Transmission and Distribution Supervisor</p>	<p>Thank you for your comment. The Tier 2 analysis that will be required for this project and which will specify the exact alignment of a future roadway will take the TEP suggestions into account. The Tier 2 project will work with TEP to find the best solution to accommodate both roadway and electrical transmission lines.</p>

Public Comments and Responses

Public comments on the Draft Tier 1 EIS were received throughout the public comment period from November 6, 2020 to January 8, 2021, including the public hearing and engagement on December 1 and 3, 2020. A total of 83 comments were received through online and written comment forms, phone calls, mail, email, and verbally at the public hearing and public engagement.

A table of public comments and ADOT's individual responses to each public comment, which answer questions, provide additional explanation, and direct the commenters to additional information, appears on the following pages.

The Errata section of the Final Tier 1 EIS shows all substantive changes made to the EIS in response to pertinent public comments.

NAME	CHANNEL	COMMENT	RESPONSE
Lamb, J.J.	Comment form	<p>Continue close consultation with the Tohono O'odham Nation & San Xavier District</p> <p>The impacts of the Sonoran Corridor will be felt in the surrounding region. The growth it will facilitate will very likely surpass the local government's ability to provide services & maintenance in the long term.</p> <p>Impacts of wildlife and open space in this mostly undeveloped area will be severe and must be considered. If built will there be wildlife crossings incorporated? How will loss of habitat and development pressures moving wildlife into populated areas be mitigated?</p> <p>How will access to I-10 from Rita Road be impacted?</p> <p>Who will the road actually benefit? The outcome will be urban sprawl development</p> <p>Impacts on cultural sites--how will this be mitigated?</p> <p>Will local organizations be engaged?</p> <p>J.J. Lamb Vail, AZ vailpreservationsociety@gmail.com</p>	<p>Thank you for your comment. Consultation with the TON and SXD will continue if the Sonoran Corridor is carried into Tier 2 studies even though, based on the Tier 1 analysis, Alternative 7 is the Selected Alternative.</p> <p>The study has identified the potential wildlife effects of the proposed corridor. One of the recommended mitigation measures is to incorporate wildlife crossings at appropriate locations along the corridor to minimize the impact of migration and feeding patterns. This is noted in Section 3.13.4 of the DEIS. The project is in response to the projected growth in the study area and is not obligated to mitigate possible habitat loss occurring from development planned by the City in the project limits.</p> <p>The interchange design for I-10/Rita Road has not been completed. A concept considered is to retain the local access to Rita Road from I-10 as it is now (improved) and incorporate a major system interchange from the Sonoran Corridor to I-10 east and west. The details would be developed in a Tier 2 analysis if Corridor Alternative 1 or 7 is selected.</p> <p>The road will support development in this area that is part of PAG's identified growth plan. It will also help reduce travel and congestion into downtown Tucson.</p> <p>Cultural site avoidance has been a specific consideration in the location of the corridor alternatives. The study team has worked with the TON Tribal Historic Preservation Officer and others to identify and provide for avoidance and protection of known sites. Unknown sites will be addressed, if they exist, in a Tier 2 analysis. Possible mitigation strategies for cultural resource effects are presented in Section 3.6.5 of the DEIS and will be further developed in a Tier 2 analysis.</p> <p>Local organizations have participated throughout the various phases of the study.</p>
Miller, Don	Comment form with letter attached	<p>Hello.</p> <p>My name is Don Miller, a resident of Marana's Continental Ranch Community for the past four (4) years. I am retired from a career of 37 years in our nation's food service industry. My wife Addy and I moved to Southern Arizona in September 2016 to be closer to our two sons and their families.</p> <p>We live virtually on the edge of the greater Tucson. We have part of the Tucson Mountains in the south/southwest of our residence, the great Catalinas foothills 10 miles to the east, Rincon Mts about 18 miles away and beautiful Santa Rita Mountains to the south. Despite living within the Tucson Basin, we are literally 7 minutes away from a totally different scene when we drive west, southwest of our home to the west side of our Rim Mountains. It is like a different world and one of simple delights; Saguaros like gigantic soldiers, protecting us from mayhem and malice, Birds of all types, undisturbed wild life, occasional traffic on Sandario Road but only during "rush hours" or within school openings, school closures. At night, one can hear unmistakable sounds of owls communicating, coyotes with an occasional community howls of delight. A beautiful vista that stretches to the Quinlan Mountains, home of Kitts Peak Observatory. The folk and residents of Picture Rocks are so lucky; no buzz of busy trucks and passenger cars of Interstate 10 and no forty five daily trains passing through their community. I am envious.</p> <p>I fear that a new freeway system designed to bypass a busy Tucson will erode the quality of serenity and quiet community for folk on the other side of the Tucson Mountain. Project designers and proponents need to hear from the communities that will be more affected by the noise of traffic bypassing their area to serve the western and northwest areas of our state and country. I urge that the Sonoran Corridor project be abandoned and resources reserved for such a project be repurposed to provide improved infrastructure of our existing roadways and major corridors.</p> <p>Respectfully, Don Miller Marana, AZ</p>	<p>Thank you for your comment. From your description, it appears you are referring to the I-11 study, which is also underway concurrent with the Sonoran Corridor study. The Sonoran Corridor is located south of Tucson International Airport between I-19 and I-10. We will forward you comment to the I-11 study team.</p>
Hurst, Jackson	email	<p>I have reviewed the Draft Tier 1 Environmental Impact Statement (DEIS) for the Sonoran Corridor Study. After reviewing the document the Corridor Alternative that I support and think should advance is Alternative 7: El Toro South to Rita Road. The reason's for this are:</p>	<p>Thank you for your comment. Your preferences have been noted and considered in the final corridor selection.</p>

NAME	CHANNEL	COMMENT	RESPONSE
		1. It avoids potential impacts to the San Xavier District of the Tohono O'odham Nation with Corridor Alternative 1: SXD to Rita Road. 2. Corridor Alternative 7 avoids the current ADOT construction project on I-10 at Houghton Road and avoids having to modify the interchange again with Corridor Alternative 8A: El Toro South to Houghton Road (Alvernon Way option). 3. Corridor Alternative 7 benefits the growing town of Sahuarita, Arizona by providing access to future planned areas and avoids major environmentally sensitive areas.	
O'Connor, Catherine	email	Hello, Catherine O'Connor, I have live where the Sonoran Corridor may be placed for 40 years and I do not want to lose everything I have built so less than 20 minutes can be cut off truckers travel.	Thank you for your comment. The location of the three corridor alternatives was determined with the objective of minimizing impacts on developed properties. These study corridors are 2,000 feet wide, much more than required by a future roadway right-of-way (about 400 feet). A final alignment of the proposed roadway will not be developed until a Tier 2 analysis is completed, but all build alternatives have the flexibility to avoid homes and other critical features and provide for reduced impacts at all locations.
Arce, Grace	email	I will agree about the construction if my house will not be in the middle and be destroy it.... is easy to say it when your house is not affected	Comment noted. A key objective is to avoid impacts to private property where possible. The Tier 1 EIS corridor alternatives were sited to afford that possibility. These study corridors are 2,000 feet wide, much more than required by a future roadway right-of-way (about 400 feet). A final alignment of the proposed roadway will not be developed until a Tier 2 analysis is completed, but all study alternatives, including Alternative 7, the Selected Alternative, have the flexibility to avoid homes and other critical features and provide for reduced impacts at all locations.
Canas, Billy	email	Looking at the planned route looks the section going west to east from El Toro rd to Alvernon will be going close or just to the north of our family's parcel. Concerned as they are wanting to build a retirement home on their land and if this is going to go really close or on the land they are concerned. The parcel is (redacted parcel #) north off of Dawson Rd. Thank you,	Depending on the final alignment, a roadway within the Selected Alternative 7 will be about 500 to 2,500 feet south of your parcel. This study identifies a wide corridor of 2,000 feet within which a more detailed highway alignment of about 400 feet will be identified. The details of the final alignment will be developed in a Tier 2 analysis that will follow this study. Public comments on the topic will be solicited as part of the Tier 2 NEPA process.
Liskiewicz, Mollie	email	Hello there, As a resident of Sycamore Park Community (the neighborhood at the dead end of Kolb Rd in very close proximity to alternative route 1), I would NOT like to have the Sonoran Corridor so close to the neighborhood. I would prefer the other alternative (8A) be considered. Many residents in our community walk the trails south of the neighborhood where alternative 1 seems to run through, additionally the noise pollution is not something I'd like to have to deal with. Many of us prefer our neighborhood to be at the dead end of a road simply for less traffic, road noise, and our neighborhood stays safer from those up to no good. If a highway alternate route were introduced, it would bring all of that right to our backyards... literally. Please consider alternate route 8A instead. Thank you very much for your time, I appreciate it! I hope you have very happy holidays or at least a very happy winter season. Best wishes, -Mollie Liskiewicz	Depending on the final alignment, the east-west segment of a roadway within the Selected Alternative 7 would pass the Sycamore Park neighborhood between 3,000 feet and 5,000 feet south of the current terminus of Kolb Road. This study identifies a wide corridor of 2,000 feet, within which a more detailed highway alignment of about 400 feet will be identified. The details of the final alignment will be developed in a Tier 2 analysis that will follow this study. Noise studies will also be part of the Tier 2 analysis. A key difference between Corridor Alternatives 7 and 8A is in how effectively they serve the anticipated growth in the area. Corridor Alternative 7, along Old Vail Connection Road, is closer to existing and future employment (which is a critical objective of the study) and has fewer environmental impacts than Corridor Alternative 8A. Public comments on the topic will be solicited as part of the Tier 2 NEPA process.
Fridlund, Christine	email	Living south of I10 in Sycamore Park I think the best route for this construction route is 8A. There is already to much traffic on Rita Road and I 10. Houghton Rd makes more sense being it is a north south road thru the city and further out of the city.	Depending on the final alignment, the east-west segment of a roadway within the Selected Alternative 7 would pass the Sycamore Park neighborhood between 3,000 feet and 5,000 feet south of the current terminus of Kolb Road. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be identified. The details of the final alignment will be developed in a Tier 2 analysis that will follow this study. A key difference between Corridor Alternatives 7 and 8A is in how effectively they serve the anticipated growth in the area. Corridor Alternative 7, along Old Vail Connection Road, is closer to existing and future employment (which is a

NAME	CHANNEL	COMMENT	RESPONSE
			critical objective of the study) and has fewer environmental impacts than Corridor Alternative 8A. Public comments on the topic will be solicited as part of the Tier 2 NEPA process.
Work, Jim	email	Please consider bicycle traffic when designing the corridor. Especially the southern end in Sahuarita and Green Valley near I-19. Jim Work Sahuarita, AZ (winter snow birds)	This study identifies a wide corridor that can accommodate not only the roadway, but other features as well. Bicycle facilities (existing and proposed, both along and across the facility) would be a consideration during the more detailed design and alignment of the roadway in a Tier 2 analysis that will follow this study.
Brennan-Glynn, Kathleen	email	The citizens of Tucson, Pima County, and Arizona deserve to know where the water is going to come from to support all of this new industry, plus the new housing and services that will be needed to support it. We (Arizona) have been in a sustained drought. Long-time residents with children are relocating out of state because they foreseen this area to be uninhabitable in 20 years due to the lack of a reliable water source. Therefore, the proposed increase of industries, housing and businesses that will exponentially stress our already too limited water resources is NOT in the best interests of the future of this state. What good more jobs in a place where people are unable to live? Respectfully submitted, Kathleen Brennan-Glynn, Ph.D.	The proposed action and its alternatives is in response to the identified needs to improve the existing transportation network, reduce existing and future traffic congestion, and improve regional and interstate mobility; the action intended to facilitate unplanned growth. While water supply is a growing concern in the state of Arizona, the concern is far-reaching and is not directly tied to transportation.
Damon, Linda	email	Dear ADOT Folks, Can you please plan wildlife tunnels and/or bridges to protect our precious wildlife? Thank You, Linda Damon	Wildlife corridor protection, including providing wildlife crossings of the Sonoran Corridor, are recommended as a mitigation measure for any impacts on wildlife connectivity. Please see Section 3.13.4 of the DEIS.
B, Heather	email	The sign in for comments on meeting was closed before all spots were filled Where in the corridor going to be exactly in East Sahuarita. When are we going to know if going to lose homes? Need more detailed maps Need a better timeline Is there going to be an exit in East Sahuarita? Are folks in East Sahuarita going to have any representation? Is our local taxes going to pay for maintaining the corridor? Are home and landowners going to be fairly compensated for their losses? What will happen to our private wells in East Sahuarita?	No one was excluded from offering comments either at the live meeting or online after the outreach events. Thank you for submitting your comment via email. Corridor Alternatives 7 and 8A follow the same path in the Sahuarita area. The north-south segment is located along Alvernon Way. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be identified. The final alignment will be developed in a Tier 2 analysis that will follow this study. A primary objective of the study is to minimize the impact on private properties and homes in particular. No homes have been identified to be impacted at this stage of the analysis. Maps of the wide 2,000-foot corridor are available on the ADOT website at https://apps.azdot.gov/files/planning/sonoran-corridor/deis/SC-Tier-1-DEIS-Chp5-Preferred-Alternative.pdf . The timeline for completion of this study is summer 2021. A Tier 2 analysis will follow and is subject to the availability of the necessary funding, which has not yet been identified. Construction would occur, if a project is approved, after the Tier 2 analysis is completed, final design plans are prepared, and construction funding is programmed. The final locations of the interchanges for the Sonoran Corridor have not been established, but it is not unreasonable to expect an interchange at Sahuarita Road and the Sonoran Corridor. All interested parties are able to participate in the development of the Tier 2 analysis, including East Sahuarita residents and property owners. The public will receive notifications for public involvement, when the Tier 2 studies do receive funding and have design information to distribute. The source of funding for future work, including maintenance, has not yet been identified. If properties are needed to accommodate the final alignment of the Sonoran Corridor, property owners must be compensated, in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of

NAME	CHANNEL	COMMENT	RESPONSE
			1970, according to fair market value subject to at least two independent appraisals and, in some cases, receive relocation assistance. Private wells will be protected if they are affected by the final alignment of the facility. Until an alignment is developed, the specific effects will not be known.
B, Heather	email	Thank you for your response. Please keep me posted here in East Sahuarita Heather Pettigrew	Thank you for your comment. All interested parties are able to participate in the development of the Tier 2 analysis, including East Sahuarita residents and property owners.
Brocklehurst, Bob	email	As another resident of Voyager RV Park, I concur with Mr. Pete Letourneau's comments. We enjoy living in the desert and hiking/biking in the near-by Arizona Trust Lands. I would like to see the corridor moved to the Houghton Road alignment. Thanks, Bob Brocklehurst	Depending on the final alignment, the east-west segment of a roadway within the Selected Alternative 7 would pass the Sycamore Park neighborhood between 3,000 feet and 5,000 feet south of the current terminus of Kolb Road. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be identified. The final alignment will be developed in a Tier 2 analysis that will follow this study. A key difference between Corridor Alternatives 7 and 8A is in how effectively they serve the anticipated growth in the area. Corridor Alternative 7, along Old Vail Connection Road, is closer to existing and future employment (which is a critical objective of the study) and has fewer environmental impacts than Corridor Alternative 8A.
Letourneau, Pete	email	Dear sir or madame, Thanks for the chance to comment on the study. My friends and I live at the Voyager Park on Kolb Road off I-10. We, along with the folks at Trails West and Sycamore park enjoy having the desert so accessible and regularly use the adjacent Arizona Trust Lands for recreational use, specifically hiking and mountain biking. I reviewed your study www.azdot.gov/sonorancorridor including the 2 proposed alignment options. Either of the two corridor options will cut down the area we use to recreate as well as the freedom of movement for cattle grazing in the area. We would request that in either option you put 1 or 2 access ways, probably under the new freeway, to allow access for all users to the area south of the new freeway. That would ensure that we can continue to enjoy the area. Secondly, from our perspective, The Houghton Road alignment would take the road farther south than Rita Road, which would be beneficial for our communities. It would reduce the level of noise since the Rita Road alignment would essentially sandwich our developments between I-10 and the new freeway, effectively causing highway noise in "stereo". I had earlier suggested doing an alignment going along Sahuarita Road because I thought that might also allow you to channel traffic further south, thus allowing better access to new residential development, however it looks like that is not in the plans. Thanks for considering my comments, Pete Letourneau Tucson AZ	Depending on the final alignment, the east-west segment of a roadway within the Selected Alternative 7 would pass the Sycamore Park neighborhood between 3,000 feet and 5,000 feet south of the current terminus of Kolb Road. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be identified. The final alignment will be developed in a Tier 2 analysis that will follow this study. A key difference between Corridor Alternatives 7 and 8A is in how effectively they serve the anticipated growth in the area, as noted in the Need and Purpose in Section 1.4 of the EIS. Corridor Alternative 7, along Old Vail Connection Road, is closer to existing and future employment (which is a critical objective of the study) and has fewer environmental impacts than Corridor Alternative 8A. Treatments to address considerations such as noise impacts and other localized effects of the new facility will be decided in the Tier 2 analysis as part of the mitigation program. Once the final corridor alignment has been set, the locations of the corridor crossings will also be determined. This will include vehicular interchanges as well as wildlife crossings that will permit cross-corridor access.
McManus, Suyeon	email	Hello, My name is Suyeon McManus. I live sycamore park area. I have heard about new highway. I want to support alternative 8a. Please, please consider this route. We hear I10 traffic sound now. Making highway 1000ft from us will be really loud. Our neighborhood will tremendously suffer if highway is too close from us. Also, we have lots of children lives in this neighborhood. We just want to keep our peace. Thank you for reading my email and be safe.	Depending on the final alignment, the east-west segment of a roadway within the Selected Alternative 7 would pass the Sycamore Park neighborhood between 3,000 feet and 5,000 feet south of the current terminus of Kolb Road. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be identified. The details of the final alignment will be developed in a Tier 2 analysis that will follow this study. A key difference between Corridor Alternatives 7 and 8A is in how effectively they serve the anticipated growth in the area, as discussed in Section 1.4.1 of the DEIS. Corridor Alternative 7, along Old Vail Connection Road, is closer to existing and future employment (which is a critical objective of the study) and has fewer environmental impacts than Corridor Alternative 8A. Treatments to address considerations such as noise impacts and other localized effects of the new facility will be decided in the Tier 2 analysis as part of the mitigation program.

NAME	CHANNEL	COMMENT	RESPONSE
Brauer, Janell	email	<p>We moved to the south side of Corona de Tucson because the increase in number and strength of cell towers and the increase of smart cars with powerful cell phones in them and the power lines beside roads and hi-ways in East Tucson were making me sick!! I am very EMF sensitive.</p> <p>This has been a huge move for us. I am disturbed by the possibility that the Electro Magnetic Waves that accompany a new hi-way might be coming near where I live. The new cell towers would be particularly problematic! We cannot afford to move again so soon! We searched and searched for a place like this. Please consider placing the new short cut through an unpopulated stretch of land, and not adjacent to Corona de Tucson. This would be devastating for me! Thank you.</p> <p>Janell Brauer</p>	<p>The three corridors studied in the Tier 1 EIS are no closer than 7 miles from the Corona de Tucson community. No EMF installations have been identified as part of the Tier 1 EIS.</p>
Pigott, Christine	email	<p>Does the plan still involve Twin Buttes road?</p> <p>With all of the fear, heartache, and depression that the pandemic continues to burden upon us, the threat of losing our homes, wildlife, and precious habitat will certainly be horrific for far too many.</p> <p>Please, please consider an alternate route.</p> <p>From the heart, Christine Pigott</p>	<p>The Sonoran Corridor is located entirely east of I-19. The location of the proposed intersection with I-19 is just south of El Toro Road. The Twin Buttes reference appears to be one of the possible choices for the proposed I-11, west of I-19, which is under study between Nogales and Wickenburg. Information on the I-11 study can be found at http://i11study.com/Arizona/.</p>
Pigott, Christine	email	<p>Thank you for your reply. After further reading, I see that the corridor will go east off of I-19. What a relief!!!</p>	<p>Your understanding is correct. Thank you for your comment.</p>
Fun, SD	email	<p>Love it. Hope you can build it quickly. I like the 8A option cause it links up with Houghton which is a main corridor on the eastside. Plus it goes by the Pima County Fairgrounds which would be convenient.</p> <p>Thanks!</p>	<p>Thank you for your comment. The Selected Alternative in this Tier 1 EIS is Corridor Alternative 7. A key difference between Corridor Alternatives 7 and 8A is in how effectively they serve the anticipated growth in the area. Corridor Alternative 7, along Old Vail Connection Road, is closer to existing and future employment (which is a critical objective of the study) and has fewer environmental impacts than Corridor Alternative 8A.</p>
Howell, Griffin	email	<p>I wont be able to attend but I wanted to say I support this 100%.</p> <p>I think the only two realistic options are 7 or 8A. The connector on I-19 has to be El Toro South to link with the new I-11 Intermountain freeway.</p> <p>Lets get this thing going!</p> <p>Griffin Howell</p>	<p>Thank you for your comment.</p>
Walenga, Karen	email	<p>Formal comment on Draft Tier 1 Environmental Impact Statement:</p> <p>As a resident of Sahuarita Heights, I am very concerned about the "preferred route" that the Arizona Department of Transportation and the Federal Highway Administration are foisting upon my neighborhood, as well as other nearby areas.</p> <p>I have resided on South Country Club Road for more than 20 years, just south of El Toro Road. There are two other homes north of me and El Toro Road, one directly accessing El Toro Road.</p> <p>Will our neighborhood be destroyed due the Sonoran Corridor? Families have called this rural area home for decades.</p> <p>The map presented by ADOT does not even list Country Club Road. It does show Alvernon Road up in the Summit neighborhood, but Alvernon Road isn't listed on the map from Dawson Road north to Sahuarita Road.</p> <p>Country Club Road is paved from Santa Rita Road north to Sahuarita Road. This stretch of Country Club is a preferred thoroughfare for residents throughout Sahuarita Heights, Sahuarita Highlands and those accessing the Santa Rita Experimental Range, and the Santa Rita Mountains, as well as for trucks servicing the Imerys mining operation at Helvetia.</p> <p>What will happen to my family, my neighbors and our homes due to the Sonoran Corridor?</p> <p>Please address these concerns. Residents in Sahuarita Heights deserve to know what lies ahead so they may be prepared.</p>	<p>Depending on the final alignment, a roadway within the Selected Alternative 7 would be located between 1/2 mile and 3/4 mile south of your described location of your property. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be identified. The details of the final alignment will be developed in a Tier 2 analysis that will follow this study. Public comments on the topic will be solicited as part of the NEPA Tier 2 process. At this stage of analysis, the 2,000-foot-wide corridor follows Alvernon Way from a point south of Dawson Road northward. Country Club Road is about 1 mile west of the proposed corridor location.</p> <p>The future Tier 2 analysis will determine the exact location of the much narrower roadway right-of-way (about 400 feet) and will make every effort to avoid direct impacts on homes and local neighborhood circulation systems.</p>

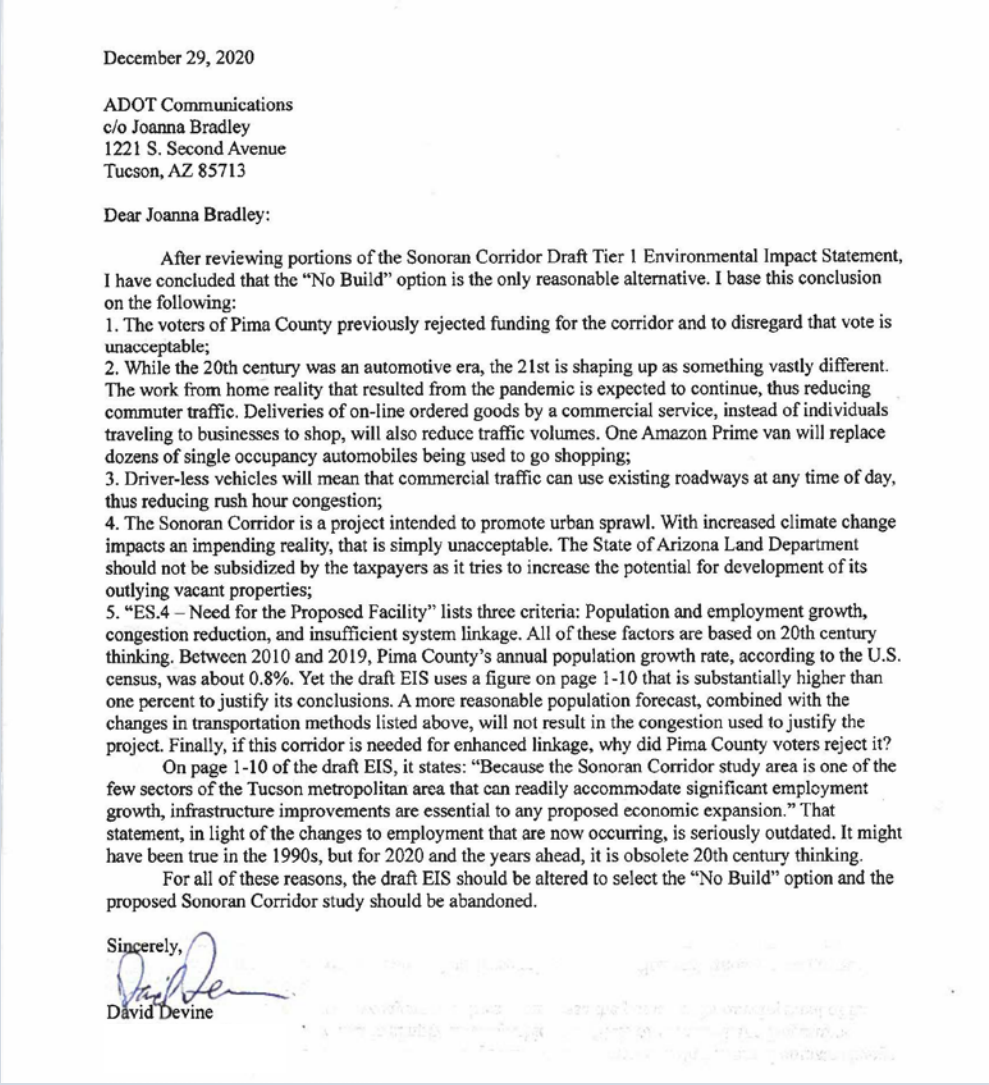
NAME	CHANNEL	COMMENT	RESPONSE
		Karen Walenga Sahuarita, AZ	
Hall, Catalina	email	<p>This plan, as a whole, looks like an freeway that will be little used and hard to justify. Only vehicles who head north on I-19 and intend to go east on I-10 and those who are on west bound I-10 and turning south on I-19 will see this as a time and mile saver.</p> <p>I fail to see how this construction will help ease any congestion in Tucson itself. I am also concerned that any highway construction will introduce more reasons to build more roads in places where they are not needed or wanted.</p> <p>Sincerely, Catalina Hall</p>	Based on the project Need and Purpose, the Sonoran Corridor will also provide needed transportation capacity and connections for planned growth in Tucson, Sahuarita, and Pima County within the study area, in addition to the purpose mentioned in the comment.
Dubberly, Patrick	email	<p>Good Afternoon,</p> <p>I work in the Land Resources department at Tucson Electric Power (TEP). We would like to request GIS data for the ADOT Sonoran Corridor Alternatives to help us with internal analysis for TEP projects in the area. Can you please share a geodatabase with the planned project alternatives centerlines, corridors, right-of-ways, and any other relevant data? This would be much appreciated in conducting our efforts with accurate data.</p> <p>Let us know if you have any questions or concerns.</p> <p>Thanks, Patrick "P-Dub" Dubberly GIS Analyst Land Resources – RC131 Tucson Electric Power Mobile: (520) 829-1246 pdubberly@tep.com</p>	Thank you for your comment. We will provide the requested data.
Calhoun, Susan	email	<p>Hello,</p> <p>Thank you for the helpful information on your website regarding the development of the Sonoran Corridor. Because of the chart, I can see that none of the proposed alternatives go through the AZ Trail. I just want to point out, however, that you are in the vicinity. (The AZ Trail runs roughly along Hwy 83 coming north from the Santa Rita Mountains, heads under 83 and heads northeast, crossing over the Old Sonoita Hwy and then under I-10 and then heading towards Colossal Cave.) This is an incredible resource that has recently been completed and I would like it to be preserved and kept wild for people to enjoy for years to come. You can find a detailed map of the Arizona Trail at aztrail.org. The proposed corridor does not pass through, but is in the vicinity of Passages 6 and 7.</p> <p>https://aztrail.org/explore/passages/passage-6-las-colinas/ Passage 7: Las Cienegas – Explore the Arizona Trail</p> <p>Thank you for the opportunity to comment. Please take good care of our beautiful desert land.</p> <p>Sincerely, Susan Calhoun</p>	Thank you for your comment and recommended resource information. The potential for affecting the AZ Trail will be considered in future Tier 2 environmental analyses of the proposed action.
Colton, Mark	email	<p>First, I would like to thank you for the opportunity to have my voice heard regarding the proposed routes for the Corridor.</p> <p>Before I ask my question, I want to speak against option 8A, as it runs through the rural community populating Section 11 and would negatively impact the peaceful lives of everyone in that community. Option 7 would be far more acceptable, as it is a mile north of that community, and can easily tie into Aerospace Pkwy to give Raytheon employees a direct route from Rita Ranch.</p>	<p>Thank you for your comment. The Selected Alternative in this Tier 1 EIS is Corridor Alternative 7 along Old Vail Connection Road, for many of the reasons you note in your comment.</p> <p>For any necessary property acquisition, the determination of compensation will be subject to federal law, which considers the types of concerns you mention in your comment.</p>

NAME	CHANNEL	COMMENT	RESPONSE
		<p>My property is about 600 ft south of Whispering Sage (which is the center of the 2000 ft study corridor for option 8A). If Whispering Sage is chosen as the final alignment, my property will be outside of the 400 ft right-of-way; however, my only access to my property will be cut off and our shared water well, which is located on Whispering Sage, will be destroyed.</p> <p>So my question is: Will my property be purchased even if it is not within the final 400 ft right-of-way?</p> <p>Also, the report stated a cost of \$40k per property to purchase the properties within the right-of-way. That is concerning, as my property value is near \$200k at the moment. How will the purchase price be determined, given the property values will likely drop like a rock once a route choice is announced?</p> <p>I feel for you, as you are going to upset people's lives no matter what you do. I just would like to have solid information about the process so I can make good decisions about my future.</p> <p>Thank you, Mark</p>	<p>It is unlikely that properties not within the needed rights-of-way or within the construction impact area would be purchased, but each property will be addressed independently once a final alignment and its implications are known. There has been no determination of property value for property acquisition on this project. That would be subject to independent appraisals according to legal requirements imposed by federal law (Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970).</p>
Emerick, Jessica	email	<p>Good Afternoon,</p> <p>I just wanted to provide my opinion on the Sonoran Corridor highway study. I am concerned about the highway being connected so close to the Sycamore Park neighborhood as I am part of the community who lives there. This highway would cause more sound pollution than we already experience with the airport. It could also disrupt the wildlife living in that area and potentially cause more danger for us and the wildlife as it would bring them closer/force them to enter our neighborhood more often.</p> <p>Please consider an alternate route/one that is a further distance from us.</p> <p>Thank you for your time.</p> <p>Sincerely, Jessica Emerick</p>	<p>Depending on the final alignment, a roadway within the Selected Alternative 7 would be located between 1,000 feet and 3,000 feet south of the current southernmost point of S. Pantano Road. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be identified. The final alignment will be developed in a Tier 2 analysis that will follow this study. Public comments on the topic will be solicited as part of the Tier 2 NEPA process. A key difference between Corridor Alternatives 7 and 8A is in how effectively they serve the anticipated growth in the area. Corridor Alternative 7, along Old Vail Connection Road, is closer to existing and future employment (which is a critical objective of the study) and has fewer environmental impacts than Corridor Alternative 8A. Treatments to address considerations such as noise impacts and other localized effects of the new facility will be decided in the Tier 2 analysis as part of the mitigation program.</p> <p>Once the final corridor alignment has been set, the locations of the corridor crossings will also be determined. This will include vehicular interchanges as well as wildlife crossings that will permit cross-corridor access.</p>
Stromberg, Christy	email	<p>To whom it may concern:</p> <p>I live in the Sahuarita Highlands subdivision off of Santa Rita Rd. The proposed route on your website would put the Sonoran corridor in my backyard (literally). Our neighborhood is a quiet one surrounded by a nature preserve area. There are lots of plants and animals that live in the open desert around our subdivision such as coyotes, jackrabbits, roadrunners, javelina, desert tortoises, Pima pineapple cacti, saguaros, etc. This proposed highway would cut through their habitat and I'm afraid the end result would be devastating to wildlife. Second, the proposed highway would impact air quality for Sahuarita in a negative way. The people that live out here have done so in order to get away from the city and it's pollution. My son has asthma and I worry that he will not be able to play outside regularly without breathing difficulty when there's a busy highway in our backyard. I am pleading with you to find another route for the Sonoran corridor that is further north closer to Tucson, such as the Pima Mine Rd option.</p> <p>Regards, Christy Stromberg</p>	<p>Depending on the final alignment, a roadway within the selected Corridor Alternatives 7 would be located between 400 feet and 2,500 feet north of your described location of your property. These corridor alternatives were shown to be most effective in addressing the key objectives of the study. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be developed in a Tier 2 analysis that will follow this study. Public comments on the topic will be solicited as part of the Tier 2 NEPA process. At this stage of analysis, the 2,000-foot-wide corridor follows between your community of Sahuarita Highlands and Dawson Road. The future Tier 2 analysis will determine the exact location of the much narrower roadway right-of-way (about 400 feet) and will make every effort to avoid direct impact to homes and local neighborhood circulation systems. The Tier 2 study will also address and offer appropriate mitigation of impacts on the natural environment, where necessary.</p>
Aguilar, Jese	email	<p>I think this highway is a good thing for Tucson because if they don't make one at all, traffic on i10 and i19 is gonna get even worse. Also it would be nice to see that area grow.</p>	<p>Thank you for your comment.</p>
Stack, Charles	email	<p>I am Board Certified in Environmental Science Sustainability by the American Academy of Environmental Engineers & Scientists and have a comment regarding the proposed Sonoran Corridor extension.</p> <p>According to the Draft Tier 1 EIS, the preferred route is Alternative 7, which is from I-19 near the Toro Road section east to I-10 at Rita Road.</p>	<p>The Selected Alternative, Alternative 7, was determined following the completion of the public comment period and any additional analysis that may prove necessary. Corridor Alternative 1 has been studied along with Corridor Alternatives 7 and 8A. While it is the shortest of the three, Corridor Alternative 1 does not address all the study objectives as effectively as Corridor Alternative 7, based on the analyses completed to date. Corridor Alternative 1 on the San Xavier District of the Tohono O'odham Nation is subject to a different set of requirements because the Nation is a sovereign government. Much of the decision about what can and cannot be done on Tribal lands is the</p>

NAME	CHANNEL	COMMENT	RESPONSE
		<p>However, I believe that Alternative 1, which proceeds from the San Xavier district east to Rita Road, is superior. Please refer to "Figure ES-7. Reasonable Range of Corridor Alternatives" in the EIS Executive Summary.</p> <p>The reason for this is to conserve water during construction. The Green Valley/Sahuarita region is burgeoning, and construction of the preferred alternative will require water extracted from our water supply in order to reduce haulage.</p> <p>Furthermore, if the proposed Rosemont Mine project proceeds, this will consume approximately 5 million US gallons of water per day for the lifetime of the project, putting a great deal of pressure upon regional water supplies.</p> <p>Moving construction of the Sonoran Corridor further north from Sahuarita will involve a shorter construction path of the extension, consuming less water and avoiding conflict with Sahuarita and Green Valley for our water supplies.</p> <p>I am intending to comment about this during the upcoming conference call. Thank you for considering my comment.</p> <p>Charles R. Stack, MPH, Board Certified Environmental Scientist Certification Number 17-60011 Vice-President, CTO NeoChloris, Inc. 155 N. Harbor Drive, Suite 4203 Chicago IL 60601-7373 cstack@NeoChloris.com http://www.neochloris.com</p>	<p>purview of the allotted property owners. To date, there has not been the necessary support for the Sonoran Corridor from the allottee private landowners to move forward on their lands.</p>
Royal, Michelle	email	<p>I am concerned with a road of that nature being added in our small community, as it is not a fit. We enjoy the country and quiet environment we live in and paid a lot of money to have it this way. So, I am VERY concerned about that addition of a highway of such magnitude. Being a concerned neighbor, I would like to know why we weren't notified or made aware of this project going in. What road is this being planned on replacing? When and where can I voice my opinion and concerns about this? Are there any up-coming meetings or forums?</p> <p>Michelle</p>	<p>Thank you for your comment. This particular study began in 2017 and has held numerous public meetings beginning in June 2017 to discuss the objectives of the study and findings of the analyses (in 2018 and 2019) as they were developed, leading to this public comment period on the Draft Tier 1 EIS. The Sonoran Corridor does not replace an existing road. It would be a new facility serving the area. Additional public comment will be sought during any Tier 2 studies to follow completion of the Tier 1 EIS.</p>
McClellan, Janice	email	<p>Releasing this draft for public comment during the Holiday season is irresponsible. With Thanksgiving, Hanukkah, Christmas, & New Years all in the timeframe, along with the pandemic concerns, it is unlikely that people will have the time or where withall to read the draft and submit their comments.</p> <p>The public comment period should be extended to March 1st to allow enough time for input by all who will be affected.</p> <p>A Concerned Sahuarita Resident,</p>	<p>The public comment period was noticed and began on November 6, 2019 and extended for 63 days until January 8, 2021. Recognizing the potential holiday impact, the comment period was lengthened from the statutory 45 days to 63 days to allow for the concerns you mention.</p>
McClellan, Janice	email	<p>The Sonoran Corridor through Sahuarita? NO!!!!!!</p> <p>The main purpose of the Sonoran Corridor is to "accommodate future growth & economy by improving connection between Mexico, AZ, New Mexico & Texas" providing a faster route east between I-19 & I-10, which would be a freeway / essentially a truck route from Mexico to points east.</p> <p>The Sonoran Corridor Tier I EIS Draft that is currently in the public comment phase, identifies the "Preferred Route" as Alternative 7 - which runs from I-19 east at El Toro Rd then north on Alvernon to an east connection point at Rita Rd & I-10. The Alternative 8 in the EIS also runs east at El Toro Rd & north on Alvernon then east to Houghton Rd at I-10.</p> <p>If placed at either of these El Toro Rd locations, the Sonoran Corridor would run smack dab through the middle of Sahuarita. Why is this a bad idea?</p> <ol style="list-style-type: none">1. It would route trucks heading east through the middle of Sahuarita, which would increase noise & air pollution & further divide our community2. It is a violation of the transportation vision in the Sahuarita 2035 Aspire Plan that Sahuarita voters approved in 2015.	<p>Thank you for your comments. The Sonoran Corridor is being studied to:</p> <ol style="list-style-type: none">1) address planned growth within the study area as noted in Section 1.4.1 of the DEIS as well as provide a more efficient path for commercial vehicles travelling to and from points east.2) The Aspire Plan corridor location was not a viable option because of the effect it has on allotted lands and property owners within the San Xavier District of the Tohono O'odham Nation. Alternatives 7 and 8A are generally consistent with the El Toro location in the Aspire Plan and have been discussed with the Town. The specifics of the roadway configuration will be developed in a Tier 2 analysis.3) Impacts generally described throughout the impacts chapter (Chapter 3 of the DEIS) will be studied in detail during Tier 2 studies along with appropriate mitigation where warranted.4) No displacements are anticipated at this time. A final determination will be made once a specific alignment is defined. <p>5 through 12) The effects cited in the comment are based on a wide corridor of 2,000 feet. The actual effect of the corridor cannot be known until a specific alignment (400 feet or less) is defined. The narrower footprint will likely</p>

NAME	CHANNEL	COMMENT	RESPONSE
		<p>In the 2035 Aspire Plan, the Sonoran Corridor was portrayed intersecting with I-19 north of Pima Mine Road - so access for Sahuarita residents, without disrupting & harming our community. El Toro Rd was identified as an important arterial road / future Parkway. The description of arterial roads & parkways by both ADOT and Pima County are 4 - 6 lane roads divided by landscaped medians, with bike lanes and sidewalks or walking paths along both sides, and with public transport pullouts. The focus of future road development in the Sahuarita 2035 Aspire Plan was to provide multi- modal means of transportation within the community.</p> <p>The Sahuarita Town Council & Officials betrayed the vision that the residents of Sahuarita voted for in the 2035 Aspire Plan. In 2016, the Council passed a resolution requesting ADOT to consider locating the Sonoran Corridor at El Toro Road. This is NOT for the benefit of most Sahuarita Residents!</p> <p>Obviously, a freeway / truck route does not provide the multi-modal connectivity that Sahuarita residents voted for.</p> <p>3. Nor does it preserve the quiet, small town feel, the air quality, and the beauty of the desert, and dark night sky that make Sahuarita such a desirable place to live. The Sahuarita Marketing Plan talks about ways to connect the different neighborhoods within Sahuarita, creating a sense of place, and emphasizing the quality of life that Sahuarita residents have come to love, and the peaceful "small town" setting.</p> <p>Per stats in the Tier I EIS:</p> <p>4. It would impact at least 54 - 100 residential units that lie within these Corridor paths</p> <p>Note: The Alternative 1 in the EIS would impact only 5residential units – but supposedly these were contacted and were opposed to the idea of relocating – how many of the affected Sahuarita residents were contacted?!)</p> <p>5. Noise & vibration would impact at least two residential areas</p> <p>6. It would eliminate 232 acres of farmland</p> <p>7. It would impact 218 acres of riparian area and 50 acres of Sonoran Desert tortoise habitat</p> <p>8. It would be detrimental to wildlife movement & cause habitat fragmentation</p> <p>9. There are 28 - 30 known cultural sites that would be affected</p> <p>10. There are 41 - 43 wells and 241 acres of floodplain in the paths</p> <p>11. There are 211,811 - 220,569' of epheremal washes & 9 acres potential wetlands in the paths</p> <p>12. These routes would only save 16 - 17 minutes – hardly worth all of the destruction!</p> <p>Either the Sonoran Corridor should be located at the Alternative 1 location, or the NO Build would be a better use of transportation dollars by making significant improvements to many roadways, which would benefit many more people and be more helpful in facilitating less congestion.</p>	<p>produce fewer detrimental effects than noted in the Tier 1 EIS. Potential effects to residents and wildlife and measures to avoid or mitigate those effects will be analyzed in the Tier 2 environmental study.</p>
Hughes, Leila	email	<p>Writing to object to this road thru Green Valley AZ on highway 19. The noise and pollution from the current freeway are enough for Green Valley to bear. As well as the mines to the west of Green Valley.</p> <p>"Improvements" to Highway 19 to create Highway 11 will ruin Green Valley, a retirement area. By widening the current freeway It will ruin the desert and displace native desert animal species and plants. And possibly people who own houses along the corridor.</p> <p>Elderly people already suffering from old age diseases will be plagued with additional pollution from the road, which will further deteriorate their health. There will be increased noise and vibration with the additional truck traffic from Nogales.</p> <p>SOLUTION:</p> <p>No changes to the road other than repaving ? The road in Mexico is only 2 lanes on each side.....</p> <p>Route 11 as a bypass around Green Valley to the west from Nogales behind the Sierrita mountain range ? Ban large trucks from Highway 19 other than those delivering into the area.</p>	<p>Thank you for your comments. The proposed Sonoran Corridor does not impact Green Valley directly and proposes no widening of I-19. Its connection to I-19 is located north of Green Valley within the Town of Sahuarita, near El Toro Road. A key purpose of the proposed roadway is to address planned growth within the study area. Adverse effects such as noise and vibration are discussed in Section 3.10 of the DEIS and will be addressed in greater detail during Tier 2 studies if there is a future project.</p> <p>Policies affecting the operational practices on Interstate highways are beyond the scope of the Sonoran Corridor project.</p>

NAME	CHANNEL	COMMENT	RESPONSE
		Thank you for your consideration. Leila Hughes Green Valley resident	
Huntsman, Bonnie	email	Hello, My husband and I moved to the Sahuarita Highlands community a few years ago because it was so peaceful and quiet. The location of this highway will be so close to our house we will never hear the sounds of the desert from home again. I am concerned about the air quality we will have once the highway comes through, and worried about the impact on wildlife. I hope you decide not to build the highway, or at least, not to build it so close to our house. Thanks,	Thank you for your comment. Depending on the final alignment, a roadway within the selected Corridor Alternative 7 would be located between 400 feet and 2,500 feet north of Sahuarita Highlands. These corridor alternatives were shown to be most effective in addressing the key objectives of the project. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be identified. The final alignment will be developed in a Tier 2 analysis that will follow this study. Public comments on the topic will be solicited as part of the Tier 2 NEPA process. At this stage of analysis, the 2,000-foot corridor alternatives run between Sahuarita Highlands and Dawson Road. The future Tier 2 analysis will determine the exact location of the much narrower roadway right-of-way (about 400 feet) and will make every effort to avoid direct impact to homes and local neighborhood circulation systems. The Tier 2 study will also address and offer appropriate mitigation of impacts on the natural environment where necessary.

NAME	CHANNEL	COMMENT	RESPONSE
Devine, David	Letter	<p>Preference for No Build based on 5 principal points and other considerations (see scanned letter)</p> 	<p>Thank you for your comments. They have been considered in the identification of the Selected Alternative.</p>
Baum, Fred	email	<p>I am a resident of Quail Creek here in Green Valley Sahuarita. I am strongly opposed to the plans which will bring a faster route between I-10 and I-19 via El Toro Road.</p> <p>The quiet family community of Sahuarita and neighboring communities will not see any benefit with adoption of this plan.</p> <p>It is also not part of and conflicts with the Aspire Plan 2035 that was approved a few years ago.</p> <p>Please stop alternatives 7 and 8 from being approved.</p> <p>Thank you</p> <p>Fred Baum</p> <p>Quail Creek</p>	<p>Thank you for your comment. The Sonoran Corridor is not in the location it is shown on the Aspire Plan, which corresponds most closely to Corridor Alternative 1. Corridor Alternative 1 on the San Xavier District of the Tohono O'odham Nation is subject to a different set of requirements because the Nation is a sovereign government. Much of the decision about what can and cannot be done on Tribal lands is the purview of the allotted property owners. To date, there has not been the necessary support for the Sonoran Corridor from the allottee private landowners to move forward on their lands. It also does not provide the same level of benefit that can be derived from Corridor Alternative 7, the Preferred Alternative. The Town of Sahuarita General Plan (Aspire Plan) identifies significant growth in the east. The Town has developed concepts for segments in unincorporated Pima County east of the present Town boundaries that include additional growth opportunities (East Sahuarita Conceptual Area Plan or SECAP) and is also noted in the General Plan discussion and mapping. The Aspire Plan also shows a major</p>

NAME	CHANNEL	COMMENT	RESPONSE
			transportation corridor on the El Toro Road alignment. The Sonoran Corridor is not on the exact alignment of El Toro Road, but would serve the intent of the major corridor in the General Plan.
Lopez, Virginia	Letter	<p>3564 S. Corte De La Perla Green Valley, AZ December 31, 2020</p> <p>Dear Joanne Bradley</p> <p>Green Valley Newspaper outlining the route proposals for the planned corridor to shorten the distance between highways 19 and 10 when traveling east.</p> <p>Several options include bisecting the Sahuarita community which I believe would be detrimental to the community for a variety of reasons:</p> <ol style="list-style-type: none">1. The Aspire Plan which residents approved in 2015 would be negated.2. The quality of community life would be impacted due to emissions and noise.3. It would adversely affect environmentally important areas for water movement, flora, and fauna. <p>Of the two options not impacting Sahuarita, one may have detrimental effects for the San Xavier area for the same three reasons as stated above.</p> <p>Further, with the recent VP Pence visit to International Harvester in anticipation of extending big government orders of its earth moving machinery for the commercial highway from Nogales northward, I think that's enough to contemplate for our area.</p> <p>My vote would be to improve the connections to 10 that already exist; Sahaurita Rd from 19 to 83, Houghton Rd. from Sahuarita Rd. to 10, and expanding sections of 19 north of Duval Mine Rd. and 10 from north of the 19 cut-off to Houghton Rd.</p> <p>Thank you for considering my views regarding local highway plans and improvements.</p> <p>Sincerely, Virginia B. Lopez</p>	<p>Thank you for your comment. The Sonoran Corridor is not in the location it is shown on the Aspire Plan, which corresponds most closely to Corridor Alternative 1. Corridor Alternative 1 on the San Xavier District of the Tohono O'odham Nation is subject to a different set of requirements because the Nation is a sovereign government. Much of the decision about what can and cannot be done on Tribal lands is the purview of the allotted property owners. To date, there has not been the necessary support for the Sonoran Corridor from the allottee private landowners to move forward on their lands. It also does not provide the same level of benefit that can be derived from Corridor Alternative 7, the Selected Alternative. The Town of Sahuarita General Plan (Aspire Plan) identifies significant growth in the east. The Town has developed concepts for segments in unincorporated Pima County east of the present Town boundaries that include additional growth opportunities (East Sahuarita Conceptual Area Plan or SECAP) and is also noted in the General Plan discussion and mapping. The Aspire Plan also shows a major transportation corridor on the El Toro Road alignment. The Sonoran Corridor is not on the exact alignment of El Toro Road, but could serve the intent of the major corridor in the General Plan.</p>
Taylor, Kelly	email	<p>We need voices of reason – not greed.</p> <p>When I saw the ADOT notice of a meeting in December 2020 right before the holidays on the proposed Sonoran Corridor, I felt as if someone had punched me in the stomach. In this time of Covid19, when families were dealing with illness and death, unemployment, eviction, hunger, financial crisis, loss of healthcare coverage, not to mention trying to get into the holiday spirit, and ADOT decided that THIS was the time to re-propose this unnecessary corridor which will benefit only those who have millions of dollars already?? REALLY??? A project that was already rejected by voters in the 2015 Pima County bond election! Apparently, ADOT did not even give that a second thought, though they may have considered that interest in these meetings in December would be relatively low due to these challenging times. Perhaps they thought they could sneak it in and we wouldn't notice.</p> <p>All of this does not change the fact that the use of any public money for the development of a potentially unprofitable road corridor is particularly bad at a time when states and municipalities and our federal government are struggling because of the pandemic and economic downturn. Truly, it is an embarrassment to even suggest it.</p>	<p>Thank you for your comment.</p> <p>The Sonoran Corridor project has been underway since early 2017 and has provided multiple opportunities for community input throughout the process. The Sonoran Corridor Study that was up for the bond election in 2015 was developed by Pima County and was a separate project from this one.</p> <p>The Sonoran Corridor is proposed as a means of addressing future needs in the area. If growth occurs as anticipated, it will require infrastructure to function.</p> <p>For clarification, the Sonoran Corridor is separate from the I-11 project and is being conducted independently. It is not a "first leg" of any other project. Per the established need and purpose, the project will benefit commuters and commercial truck traffic, as well as local traffic.</p> <p>I-11 project comments will be forwarded to that project team for consideration.</p>

NAME	CHANNEL	COMMENT	RESPONSE
		<p>We all know:</p> <ul style="list-style-type: none"> - that the primary beneficiaries of the Sonoran Corridor are: <ul style="list-style-type: none"> o Raytheon, a multi billion dollar corporation o U of A Technology park which takes in about \$12 million annually o Multi Million dollar Real Estate Developers that even though this road was renamed the "Sonoran Corridor", that it is the first leg of the proposed Interstate 11 route through the Avra Valley. And so, any discussion of the Sonoran Corridor must include the broader discussion of I11 through the Avra Valley. - that I11 through the Avra Valley would totally destroy the tourist experience at Arizona Sonora Desert Museum, a tourist attraction that generates millions of dollars each year for our economy. - that I11 through the Avra Valley would also destroy the outdoor tourist experiences in Saguaro National Park – West. Why would people come to breathe the fumes of gasoline, hear the noises of an interstate, and view the ugliness of this road while hiking in the park? Again, a tourist attraction generating millions for our state. - that I11 through the Avra Valley would be paving through one of the last swaths of the Sonoran Desert. Once it's gone, it's gone. Gone for future generations. - that I11 through the Avra Valley would violate the Pima County Board of Supervisors' Resolution 2007-343 which opposes "the construction of any new highways in or around the County that have the stated purpose of bypassing the existing Interstate 10 as it is believed that the environmental, historic, archaeological and urban form impacts could not be adequately mitigated." <p>Yes, this construction would create jobs. But if ADOT would refocus on the roads that we already have in Arizona that are in desperate need of repair, jobs would be created for years and years. Why not repair what we have first?</p> <p>According to ADOT, the Sonoran Corridor will be needed based on growth projections to 2045. What growth projections? Even if they had been done yesterday, they would be irrelevant as in these uncertain times, we cannot project what the next decade will bring, never mind the next 25 years! This is not "goodbye to 2020" and "hello to 2021 and now everything will be fine and back to normal". We will be living this chaos and change in our politics, economics, social structures, etc. for many years to come. Our economy has been battered by the global pandemic, our climate crisis is looming (including access to WATER), and wealth inequities are worsening.</p> <p>This Sonoran Corridor/I11 is overall a BAD idea. I do not and will not support any efforts to move this road forward.</p>	
Ebel, James	email	<p>Please consider the impact to neighborhoods North of I-10 at the three proposed alternative junction points.</p> <p>North of Rita Rd, the impact would be highly deleterious to the immediate area around Rita Ranch homes and schools.</p> <p>However, the new Michigan motor exchange design at the Houghton Road interchange would more easily accommodate the increased traffic of the Sonoran Corridor. Also, North of I-10 on Houghton, the roadway is straighter, the easements wider, and the pedestrian traffic lower than that of the curved neighborhood surrounding Rita Ranch. For this reason, I urge the selection of Sonoran Corridor Alternative 8A over the two remaining options connecting at Rita Ranch (Alternatives 1 and 7).</p>	<p>Thank you for your comment. The project considered the areas outside the project boundary, but the neighborhoods north of I-10 at the two connection points (Rita Road and Houghton Road) are about 2 miles away from the potential project footprint. The effects of existing I-10 and any projects to improve I-10 on these communities would be more substantial than any resulting from a future Sonoran Corridor.</p>
Merrill, Curtis	email	<p>I wholeheartedly approve of the construction of the Sonora Corridor. Any solution that keeps cars on the road, while also reducing congestion, expediting travel throughout Pima County, and making the infrastructure a more attractive places for the growing masses to move to and live in, I think also serves the purpose of saving the taxpayer money and preserves the environment. I believe that whichever Sonora corridor proposal that does best for reducing congestion and expediting travel throughout Pima County will accomplish all of the above.</p> <p>Thank you for your time,</p>	<p>Thank you for your comment.</p>

NAME	CHANNEL	COMMENT	RESPONSE
Scott, Michael	email	I am opposed to destroying people's property just to make other people rich. Do not build it. Double tier I-10 if (big IF) it is needed.	Thank you for your comment. As it appears to refer to the I-11 project that is also underway. It will be forwarded to that project team as well.
DK	email	Will there be any utility improvements offered for the residential areas affected by the construction of the corridor? Most of the residential areas still do not have modern internet. Will there be any form of noise/light abatement? For most people living in the affected areas, the lack of noise and lack of excessive light at night were factors in moving to the areas. Will there be exits from the proposed highway to Santa Rita Rd? To Sahuarita Rd? To Dawson Rd? Will surface streets also be improved? For example- Santa Rita Rd and Dawson Rd are currently small two lane roads that are in bad condition. Will there be funding to improve them? Will there be funding to extend the paved portion on Santa Rita Rd? The semi truck traffic on the dirt portion of Santa Rita Rd creates a large amount of lingering dust in the whole valley to Corona de Tucson. The proposed highway will only increase that traffic and increase the air pollution. Thank you!	Thank you for your comment. Any impacted utilities resulting from the implementation of the Sonoran Corridor would need to be replaced and/or enhanced. Also, while the Sonoran Corridor would create an alignment that utility companies may opt to use, the determination to use the corridor for such purposes rests with those purveyors and as such, is beyond the scope of this study. Opportunities for utility improvements will be investigated in a Tier 2 analysis that will follow this study. The Sonoran Corridor identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be developed in Tier 2. The final alignment will dictate the types of improvements that will be provided as part of a future construction project. In general, if there is an identified noise or visual impact as noted in Sections 3.10 and 3.15 of the DEIS, mitigation would be part of an implementation plan. Regarding specific locations, there is not sufficient detail yet to respond to your comment. That will occur during a Tier 2 analysis that will follow this study. It is expected you will be able to comment on the topic as part of the NEPA Tier 2 process. That includes a final determination of where interchanges might be located, but it is anticipated they would be placed primarily at major roadways, such as Nogales Highway and Sahuarita Road, or at key intermediate locations, such as Country Club or Dawson Road, if it is determined there is a need. No such decisions have been made at this time, however.
Cunes, Anna	email	Alternative 8A appears to make the most sense in my opinion. Thank you!	Thank you for your comment. Alternative 7 has been identified as the Selected Alternative because it provides better access to activities and has fewer impacts than Alternative 8A.
Lammie, Don	email	More traffic and congestion is a bad idea in Green valley & Saguarita area of I - 19	Thank you for your comment. A primary objective of the Sonoran Corridor is to provide the infrastructure needed to accommodate already planned future growth in the area in and around Sahuarita and minimize the impact of traffic and congestion on Green Valley and Sahuarita. There is also a benefit to the arterial roadway network in that a higher capacity facility would attract trips away from the local roads as noted in Section 2.6.3 of Chapter 2 of the DEIS.
Hammonds, Wanda	email	I live in southwest Tucson and often travel in the areas that would be affected by the proposed Sonoran Corridor. I support either of the alternate routes that do not run through the middle of the town of Sahuarita, including: •Corridor Alternative 1, which runs east from I-19 around the San Xavier exit. This is the shortest and least expensive of the corridor options. •No Build Option, instead of building a Sonoran Corridor, road improvements would be done, including expanding sections of I-19 and I-10, Sahuarita Road, Houghton Road and a number of other arterial roads —all at a much lower cost and of benefit to more people. Sincerely,	Thank you for your comment. Alternative 7 has been identified as the Selected Alternative.
Oravetz, Roger	email	As a resident of Sahuarita, I am strongly opposed to the proposed Alternative 7 and 8 routing that connects to I-19 near EL Toro Road. In addition to the noise and air pollution that would result from the traffic, it would require moving at least 50 houses and destroying farm land and animal habitat. Saving mostly trucks 15-20 minutes of driving time does not seem to justify all of this destruction and pollution. Don't see any benefit to the general residents of Sahuarita from this project. If this road is to be built at all, which I question, it should be routed North of Pima Mine Road where there is much more vacant land, and would be a shorter routing. If some tribal land is involved, negotiate a liberal, fair price and purchase the land. I hope this whole project is re-considered, as it appears to benefit businesses to the detriment of most people living in the Sahuarita or South of Tucson area. Thank you for the opportunity to comment.	Thank you for your comment. Corridor Alternative 7, the selected alternative in the Tier 1 DEIS, has been located to minimize as much as possible the impact on the community. A final alignment of a roadway will be determined during a more detailed Tier 2 analysis that will follow this study. At that time, the exact level of impacts will be known, but as of the completion of this study, there are not identified homes affected by the full 2,000-foot corridor. It is expected you will be able to comment on the topic as part of the NEPA Tier 2 process. The actual width of the future facility will be 400 feet or less and will minimize as much as possible any negative effects related to property infringement or environmental concerns such as noise, air pollution, or impacts on wildlife. Corridor Alternative 1 on the San Xavier District of the Tohono O'odham Nation is subject to a different set of requirements because the Nation is a sovereign government. Much of the decision about what can and cannot be done on Tribal lands is the purview of the allotted property owners. To date, there has not been the necessary support for the Sonoran Corridor from the allottee private landowners to move forward on their lands.

NAME	CHANNEL	COMMENT	RESPONSE
Sellers, Jr., William	email	<p>I am writing this in STRONG SUPPORT of BUILDING THE SONORAN CORRIDOR AS SOON AS POSSIBLE and for the following 7 reasons:</p> <ol style="list-style-type: none">1. It takes traffic pressure off of I-10 through the Tucson metro area2. COVID-19 will increase global manufacturing in Mexico and along the border region; already more than 1400 Japanese mfgs have left China for North America and other locations in Asia3. Pima County, one of the poorest larger metro's along the US-Mexican border region, will increase its attractiveness to manufacturing to employ its abundant labor supply4. Mexico will ultimately upgrade the Port of Guaymas to accommodate larger Asian-bound ship traffic5. Mexico will ultimately upgrade transportation links (rail & highway) to the Port of Guaymas, to & from Arizona and West Texas6. The upgraded Port of Guaymas & misc transportation links WILL CONSTITUTE AN IMPORTANT NATIONAL SECURITY LINK to the Pacific for the U.S.7. National Security considerations, especially in the Pacific Basin, will also favor more economic integration with Mexico <p>Thank you,</p>	<p>Thank you for your comment.</p>

NAME	CHANNEL	COMMENT	RESPONSE
Casebolt, Dana	email	We are very opposed to the Sonoran Corridor plans. We have lived at I 19 and El Toro for 35 years and want no part of a new highway exchange on top of us. We're concerned about noise, air pollution, wildlife constraints, loss of open desert, and more...	<p>Thank you for your comment. The alternatives that affect Sahuarita, Corridor Alternatives 7 and 8A, were located in consideration of the potential for impact on homes and property. The new roadway would affect the larger environment, but those effects will be mitigated as much as possible following a Tier 2 analysis. It is expected you will be able to comment on the topic as part of the NEPA Tier 2 process.</p> <p>The selected Corridor Alternatives 7 is located between 400 feet and 2,500 feet north of Sahuarita Highlands, depending on the final alignment of the roadway. These alternatives were shown to be most effective in addressing the key objectives of the project.</p> <p>The final configuration of the corridor has not been determined, though the study evaluated the maximum potential for a major highway. The configuration will be determined by demand and the availability of funding. Improvements to other roadways in the area are included in the assumptions for the Sonoran Corridor analyses.</p> <p>Corridor Alternative 1 on the San Xavier District of the Tohono O'odham Nation is subject to a different set of requirements because the Nation is a sovereign government. Much of the decision about what can and cannot be done on Tribal lands is the purview of the allotted property owners. To date, there has not been the necessary support for the Sonoran Corridor from the allottee private landowners to move forward on their lands.</p>

NAME	CHANNEL	COMMENT	RESPONSE
Langston, Brad	email	<p>I would like to provide my input on the Sonoran Corridor Project. At this point, I would prefer the project to end with no highway constructed. If it must be built, I IMPLY you to take the El Toro option off the table for the following reasons:</p> <p>El Toro option would rip through the middle of Sahuarita and affect hundreds of homeowners, displacing many. Most of these homeowners are lower income and will not be able to relocate even with fair market value given for their properties. There is nowhere else in this area they could find comparable homes with land for their animals. This would destroy their lives. Most are currently expressing fear of losing their homes. They seem unfairly targeted due to their socioeconomic class.</p> <p>Also, in the path of the El Toro alternative is my neighborhood, Sahuarita Highlands. It is a newer DR Horton development comprised of over 150 homes set on 1-2 acre lots. All of us in this area have moved to the middle of the desert to get away from freeway traffic and crowds. We live in a very quiet, peaceful desert environment. The proposed El Toro option would cause for our neighborhood to be DIRECTLY next to the freeway. This is a nightmare situation for all of us. Can you imagine if a freeway was literally built in your quiet backyard? This will destroy our property values and our investments, not to mention our quality of life. This neighborhood has provided a dream life for all of us and we are worried it will be destroyed. Like our lower income neighbors to the north, there is no other location we could recreate what we currently have. It would be unaffordable and unobtainable.</p> <p>More traffic also equates to more people and crime. It will turn pristine desert and quiet country living into a nightmare situation for several hundred households which overall consists of thousands of residents. All in the name of progress? Frankly, a freeway from Sahuarita to East Tucson isn't truly a necessity. Please put the money where it is needed – expand lanes on I-19 from Valencia Rd to Sahuarita. Improve Houghton Rd, Wilmot Rd and possibly, Nogales Hwy. A freeway through Sahuarita will create more congestion and unsafe conditions. Other than the greedy town officials of Sahuarita, very few Sahuarita residents support this plan and see it as nonsensical. The El Toro plan does not affect the town officials negatively, so of course they won't care about the actual residents.</p> <p>Again, the project is not needed. If it must be built, please consider the San Xavier option. It is far less road to be constructed and far fewer eminent domain issues with property owners. It would be completed far quicker and at a fraction of the price of the El Toro option. Although this includes reservation land, it is already being supported by their officials. It also affects hundreds fewer homeowners. If you were to offer them double or even triple the price of fair market value, they would most certainly accept, and it would still cost the project millions less in funds. There would also be greater open space to build exits with gas stations, shopping, fast food restaurants, etc.</p> <p>In conclusion, the El Toro option will affect thousands of residents in a very negative way. Please don't ruin our peaceful lives over a roadway that's truly not needed. Although people say it will be years before it happens, we will all still be living in our homes and we need to do something about it now. Unfortunately, we will all live in fear for the next several years instead of enjoying our lives. Because of this, the project has already negatively affected thousands of us. Please do the right thing here. There is so much open desert elsewhere.</p>	<p>Thank you for your comment. The alternatives that affect Sahuarita, the selected Corridor Alternative 7, was located in consideration of the potential for impact on homes and property. Income levels were not part of the placement of the corridors. The corridors in this study, which are 2,000 feet wide, did not have a direct effect on homes. No homes are expected to be taken with the Selected Alternative, Alternative 7, but that can only be fully determined following the Tier 2 study. The actual roadway, if built, will be no more than 400 feet wide and is less likely to directly impact homes. The new roadway would affect the larger environment, but those effects will be mitigated as much as possible following a Tier 2 analysis.</p> <p>Corridor Alternative 7 is located between 400 feet and 2,500 feet north of Sahuarita Highlands, depending on the final detailed alignment of the roadway. This alternative was shown to be most effective in addressing the key objectives of the project.</p> <p>The final configuration of the corridor has not been determined, though the study evaluated the maximum potential for a major highway. The configuration will be determined by demand and the availability of funding. Improvements to other roadways in the area are included in the assumptions for the Sonoran Corridor analyses.</p> <p>Corridor Alternative 1 on the San Xavier District of the Tohono O'odham Nation is subject to a different set of requirements because the Nation is a sovereign government. Much of the decision about what can and cannot be done on Tribal lands is the purview of the allotted property owners. To date, there has not been the necessary support for the Sonoran Corridor from the allottee private landowners to move forward on their lands.</p>
Jansen, Michael	email	<p>Hello,</p> <p>My name is Michael Jansen and I live in the. Valencia Reserve neighborhood in Tucson, AZ. I was very pleased to see that ADOT preferred alternative 7 (Sahuarita to Rita rd) for the Tier 1 draft EIS. I hope this will be the final ROD (record of decision) recommendation as well and that the tier 2 study will focus on this alternative. This route makes the most sense regionally in connecting the growing regions of Sahuarita and vail/Rita ranch while also going near the Tucson airport/aerospace corridor. There are not many impacts on buildings and sensitive land, and Alternative 7 has my full support going forward. This will also give truckers (and others) coming/going to Mexico a route around town. I hope this project can get funding and start actual construction relatively soon.</p> <p>Thank you, Michael</p>	<p>Thank you for your comment.</p>


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Langston, Jackie	email	<p>I would like to provide my input on the Sonoran Corridor Project. At this point, I would prefer the project to end with no highway constructed. If it must be built, I IMPLY you to take the El Toro option off the table for the following reasons:</p> <p>El Toro option would rip through the middle of Sahuarita and affect hundreds of homeowners, displacing many. Most of these homeowners are lower income and will not be able to relocate even with fair market value given for their properties. There is no where else in this area they could find comparable homes with land for their animals. This would destroy their lives. Most are currently expressing fear of losing their homes. They seem unfairly targeted due to their socioeconomic class.</p> <p>Also, in the path of the El Toro alternative is my neighborhood, Sahuarita Highlands. It is a newer DR Horton development comprised of over 150 homes set on 1-2 acre lots. All of us in this area have moved to the middle of the desert to get away from freeway traffic and crowds. We live in a very quiet, peaceful desert environment. The proposed El Toro option would cause for our neighborhood to be DIRECTLY next to the freeway. This is a nightmare situation for all of us. Can you imagine if a freeway was literally built in your quiet backyard? This will destroy our property values and our investments, not to mention our quality of life. This neighborhood has provided a dream life for all of us and we are worried it will be destroyed. Like our lower income neighbors to the north, there is no other location we could recreate what we currently have. It would be unaffordable and unobtainable.</p> <p>More traffic also equates to more people and crime. It will turn pristine desert and quiet country living into a nightmare situation for several hundred households which overall consists of thousands of residents. All in the name of progress? Frankly, a freeway from Sahuarita to East Tucson isn't truly a necessity. Please put the money where it is needed – expand lanes on I-19 from Valencia Rd to Sahuarita. Improve Houghton Rd, Wilmot Rd and possibly, Nogales Hwy. A freeway through Sahuarita will create more congestion and unsafe conditions. Other than the greedy town officials of Sahuarita, very few Sahuarita residents support this plan and see it as nonsensical. The El Toro plan does not affect the town officials negatively, so of course they won't care about the actual residents.</p> <p>Again, the project is not needed. If it must be built, please consider the San Xavier option. It is far less road to be constructed and far fewer eminent domain issues with property owners. It would be completed far quicker and at a fraction of the price of the El Toro option. Although this includes reservation land, it is already being supported by their officials. It also affects hundreds fewer home owners. If you were to offer them double or even triple the price of fair market value, they would most certainly accept, and it would still cost the project millions less in funds. There would also be greater open space to build exits with gas stations, shopping, fast food restaurants, etc.</p> <p>In conclusion, the El Toro option will affect thousands of residents in a very negative way. Please don't ruin our peaceful lives over a roadway that's truly not needed. Although people say it will be years before it happens, we will all still be living in our homes and we need to do something about it now. Unfortunately, we will all live in fear for the next several years instead of enjoying our lives. Because of this, the project has already negatively affected thousands of us. Please do the right thing here. There is so much open desert elsewhere.</p>	<p>Thank you for your comment. The alternatives that affect Sahuarita, Corridor Alternatives 7 and 8A, were located in consideration of the potential for impact on homes and property. Income levels were not part of the placement of the corridors. The corridors in this study, which are 2,000 feet wide, did not have a direct effect on homes. No homes are expected to be taken with the Selected Alternative, Alternative 7, but that can only be fully determined following the Tier 2 study. The actual roadway, if built, will be no more than 400 feet wide and is less likely to directly impact homes. The new roadway would affect the larger environment, but those effects will be mitigated as much as possible following a Tier 2 analysis.</p> <p>Corridor Alternative 7 is located between 400 feet and 2,500 feet north of Sahuarita Highlands, depending on the final alignment of the roadway. These alternatives were shown to be most effective in addressing the key objectives of the project.</p> <p>The final configuration of the corridor has not been determined, though the study evaluated the maximum potential for a major highway. The configuration will be determined by demand and the availability of funding. Improvements to other roadways in the area are included in the assumptions for the Sonoran Corridor analyses.</p> <p>Based on the project Need and Purpose (Chapter 1 of the DEIS), the Sonoran Corridor will provide needed transportation capacity and connections for planned growth in Tucson, Sahuarita, and Pima County within the study area.</p> <p>Corridor Alternative 1 on the San Xavier District of the Tohono O'odham Nation is subject to a different set of requirements because the Nation is a sovereign government. Much of the decision about what can and cannot be done on Tribal lands is the purview of the allotted property owners. To date, there has not been the necessary support for the Sonoran Corridor from the allottee private landowners to move forward on their lands.</p>



NAME	CHANNEL	COMMENT	RESPONSE
Baker, Beryl	email	<p>Sonoran Corridor Tier 1 EIS Study Team</p> <p>Ironie the name Sonoran Corridor which refers to the type of habitat that will be destroyed.</p> <p>2045 should see less people in the area due to drought and coming water shortages. CO2 concerns are telling humans to travel less so there should be less cars on the road by 2045 if humans want to save themselves.</p> <p>In no particular order some other reasons for rejecting any of the Highway Alternatives:</p> <p>Would only change travel times 16-18 minutes while spending huge amounts of money, destruction of wild habitats, noise increases changing the country living for the folks in that area by disturbing the quality of country living of folks in those areas, decreases the quality of life for people, by passes current businesses on I-10 that depends on I-10 traffic, encourages growth outside the city instead of infill, encourages destruction and eliminates wildlife habitats in the Tucson valley, a lot of money used for the benefit of a few developers, is the first leg of the much opposed I-11.</p> <p>Pima County and the City need to focus on how to be economical and water sustainable without more growth. A NO BUILD would encourage these governments to study how to actually live sustainably in this desert climate that is predicted to get hotter. Building out this highway would add more heat to the area which will be detrimental to the future by raising more the already projected and increasing temperature.</p> <p>Suspect few people attended the public meetings because of the pandemic which does not really reflect what people might think of the project. Pushing any project by government officials at this time is anti-democratic to the very people that will be negatively impacted.</p> <p>Table this project or do NO BUILD.</p>	<p>Thank you for your comments. The NEPA environmental process is designed to identify the potential effects of a project and, where needed, to provide for avoidance or mitigation of those effects. This Tier 1 EIS identifies potential effects within a wide corridor of 2,000 feet. It will be followed by a Tier 2 EIS that will identify a specific project alignment of no more than 400 feet and specific project impacts that require mitigation. The Need and Purpose for the Sonoran Corridor addresses anticipated growth and activity in the study area that will require a supporting transportation system. Still, the intent is to minimize the effects of the project as much as possible. That includes the concerns listed in the comment related to wildlife, water, climate change, etc.</p> <p>The Sonoran Corridor study has provided public input opportunities in person and via the ADOT website and telephone access since the study began in February 2017. At various stages of project development, including the initial scoping meetings, corridor selection report, and the public hearings for the Draft Tier 1 EIS, comments about the project and its intent and findings have been requested.</p>
Zatarian, Audrey	email	<p>To Whom It May Concern,</p> <p>I live in the Santa Cruz Meadows neighborhood not far from the projected Sonoran Corridor route.</p> <p>I have looked at all the maps and information available online. I am looking for more detailed information.</p> <p>Can you tell me if this will affect those of us living west of I-19 near El Toro Road but between El Toro and Duval Mine?</p> <p>Many of us frequently use El Toro to get to La Vallita as a means to get into Rancho Sahuarita without going on the freeway or going the whole length of Rancho Sahuarita Blvd off Sahuarita Road via La Canada. Can you tell how this will impact our neighborhoods from using this route?</p> <p>Will this route damage the pecan orchards?</p> <p>I am looking forward to your response.</p>	<p>Thank you for your comment. The I-19 interchange for Corridor Alternative 7, the preferred alternative in the Sonoran Corridor study, is located north of Anamax Park, about 3/4 mile north of Santa Cruz Meadows. Local access will be maintained if the project is built, though it could be modified from its current configuration if there is a need.</p>
Verts, Angela	email	<p>Good morning,</p> <p>I would like to know the distance (in miles) south of Sahuarita rd. that the proposed Sonoran Corridor would be.</p> <p>I live 1.4 miles south of Sahuarita rd on Wilmot and am concerned about the impact on our association members as well as the wildlife.</p> <p>Thank you</p>	<p>The Sonoran Corridor centerline is located between 1.4 and 1.8 miles south of Sahuarita Road. That is for a 2,000-foot-wide corridor. The final location will be determined after a Tier 2 analysis that will fix a final roadway location, which will be about 400 feet wide. The preferred alternative does not extend as far east as Wilmot Road, but turns northward at the alignment of Alvernon Way, about 3 miles west of Wilmot Road.</p>

NAME	CHANNEL	COMMENT	RESPONSE
Toborowski, Dan	email	<p>To whom it may concern,</p> <p>I am writing to submit my opposition to the proposed "Option 7" and "Option 8A" Sonoran Corridor bypass routes.</p> <p>These routes put the highway very close to several residential areas which will increase air, noise, and light pollution in the area. Many homeowners in this area specifically choose to live in this location in order to avoid these very concerns. My understanding is that a few homeowners may even need to relocate in order to facilitate the route which is obviously a major inconvenience and could cause unnecessary financial and personal stress. For those who do not need to relocate, there is also the risk of property values declining due to proximity to a major roadway. For these reasons the "Option 1" route appears to be the best option with minimal impact on nearby residential properties compared to the other routes.</p> <p>I also have concerns about the environmental damage that this roadway project would subject the natural desert land to. Valuable riparian and Sonoran Desert tortoise habitat would be lost and travel for all other animals would be limited by a new hazardous road crossing that increases risk for the animals and motorists. For this reason "Option 1" is again the better option as it would disturb the least amount of natural land.</p> <p>Lastly, as a resident of Sahuarita, I am concerned about how the presence of a large roadway through the center of our city may limit future growth opportunities where additional commercial, residential, or public spaces might no longer be able to exist in the future due to this bypass. Once again, "Option 1" provides the benefit of the bypass to the city by being close by but not directly through the center of our community.</p> <p>I hope you can factor these concerns into your continued assessment. Thank you for your time.</p>	<p>Thank you for your comment. The alternatives that affect Sahuarita, Corridor Alternative 7, was located in consideration of the potential for impact on homes and property. The corridors in this study, which are 2,000 feet wide, did not have a direct effect on homes. The new roadway would affect the larger environment as noted in Chapter 3, Section 3.3 Land Use and Displacements, Section 3.9 Air Quality, Section 3.10 Noise, Section 3.13 Biological Resources, but those effects will be mitigated as much as possible following a Tier 2 analysis.</p> <p>The Sonoran Corridor project has been proposed by local authorities to address the anticipated growth and travel needs in the study area. The decision about the type and extent of growth is the purview of each community's legislative process. This project uses those decisions as the basis for identifying the effects of such an effort and how to minimize the impacts of building it, if it is built. That decision will be the subject of further discussion once the Final Tier1 EIS/Record of Decision and an additional Tier 2 level study are completed.</p>
Timmerman, Chris	email	<p>I am writing to give my comments on the Sonoran Corridor Study Draft EIS.</p> <p>As a Tucson citizen and voter, I urge ADOT to go with the "no-build alternative" for this project. The DEIS establishes under Chapter 1: Need and Purpose, that the project is necessary to support future growth of human populations and their economic activity. The human population in the Sonoran Desert has already far outstripped the carrying capacity of the land. We are living on borrowed water, and borrowed time. Infinite future growth cannot be the premise on which our society is built. Such an assumption is the logic of cancer. It's time to stop enabling the destruction of natural communities and warming the climate by encouraging more vehicle trips with more roads by propping up limitless human impacts and expansion with ever more infrastructure.</p> <p>Please don't build this road. There are enough roads already.</p>	<p>Thank you for your comment. The Sonoran Corridor project has been proposed by local authorities to address the anticipated growth and travel needs in the study area. See Need and Purpose (Chapter 1 of the DEIS.) The decision about the type and extent of growth is the purview of each community's legislative process. This project uses those decisions as the basis for identifying the effects of such an effort and how to minimize the impacts of building it, if it is built. That decision will be the subject of further discussion once the Final Tier1 EIS/Record of Decision and an additional Tier 2 level study are completed. It is expected you will be able to comment on the topic as part of the NEPA Tier 2 process.</p>

NAME	CHANNEL	COMMENT	RESPONSE
Stewart, Elizabeth	email	<p>The Anza Trail Foundation submits these comments on the Sonoran Corridor Study Draft Tier 1 EIS and the adverse impacts that a high capacity transportation corridor will have on the Juan Bautista de Anza National Historic Trail (Anza NHT) with all alternatives routes. In the United States, the Congressionally designated Anza NHT follows the 1775 route of the Anza Expedition from Nogales to San Francisco. It provides adventure, cultural perspectives and opportunities to learn about and experience the history of the Anza Expedition.</p> <p>Within the study area, the Anza NHT and Anza NHT planned recreational segment follow along the Santa Cruz River. For a visual representation of the location of Anza NHT Historic Corridor (shaded area), planned recreational trail (pink line), and the existing Anza NHT recreational trail (red line) see MapCollaborator link below.</p> <p>For screenshots of the Anza NHT south of Tucson and near Sahuarita see attachments.</p> <p>http://www.mapcollaborator.org/mapcollab_anza/?base=streets&y=32.04475&x=-110.91351&z=11&layers=notes%2Cpoints_nophoto%2Cpoints_hasphoto%2Clines%2Crectrail_proposed%2Crectrail_potential%2Crectrail_existing%2Canzatrail%2Ccampsites2015%2Ccampsites1996&opacs=100%2C100%2C100%2C100%2C80%2C80%2C80%2C75%2C100%2C100</p> <p>The Draft EIS does not adequately address the adverse impacts such a transportation corridor would have to the recreational, cultural and historical aspects of the Anza NHT Historic Corridor or planned recreational trail. The only way to avoid such impacts is to adopt the No Build Alternative.</p> <p>A National Historic Trail is more than a narrow footpath. The Anza NHT is a multi-use trail. Hikers, bicyclist and horse riders enjoy exploring the trail. Trail users want to enjoy the setting, the greater view shed and landscape, the wildlife, and the vegetation in the context of the history and culture associated with the Anza Expedition and journeys of other early travelers. To enjoy the trail, users need a safe environment without the air pollution and excessive noise and vibration that a high capacity transportation corridor will create.</p> <p>We urge a more in depth analysis of the negative impacts to the Anza NHT and its users. Construction of a high capacity transportation corridor will damage the landscape, destroy vegetation and wildlife habitat, create air pollution, dust, erosion, excessive noise, vibrations, and fumes. In addition to the damage to the landscape and the degradation of the enjoyment of the recreational, historical and cultural aspects of the Anza NHT, it will create substantial safety hazards for trail users and wildlife.</p> <p>If such a transportation corridor is approved, we request substantial and meaningful mitigation to minimize the adverse impacts on the recreational trail including the use of noise and vibration abating materials and construction techniques for the roadway overhead and nearby and on the walls of the underpass where the roadway crosses the Santa Cruz River and the Anza NHT. Sufficient barriers should be constructed to prevent trash, objects from unsecured loads, and out of control vehicles from falling on trail users below. The overpass should be constructed so it will not result in erosion of the trail in times of high rainfall. Any area where vegetation is removed or destroyed should be revegetated. To provide adequate mitigation, AZDOT should include a transportation enhancement and build the planned Anza NHT in the area of the transportation corridor's crossing over the trail.</p>	<p>Thank you for your comments. The Tier I EIS included Juan Bautista de Anza National Historic Trail (Anza NHT) in its analysis and determined that the Anza HPT does not currently have an existing trail through the Sonoran Corridor Project area. The study included several potential mitigation concepts to incorporate the proposed Anza NHT that will be further developed in the Tier 2 Study, should the Preferred Alternative be chosen as the Selected Alternative. If the project goes to a Tier 2 study and an alignment is chosen, the project team would coordinate with the National Park Service and the Anza Trail Foundation on developing a strategy on moving forward.</p>

NAME	CHANNEL	COMMENT	RESPONSE
Fritz, Ian	email	<p>Hello,</p> <p>I am writing to give my comments on the Sonoran Corridor Study Draft EIS. (https://azdot.gov/planning/transportation-studies/sonoran-corridor-tier-1-environmental-impact-statement/draft)</p> <p>I would urge ADOT to go with a “no-build alternative” for this project. The DEIS establishes under Chapter 1: Need and Purpose, that the project is necessary to support future growth of human populations and their economic activity. The human population in the Sonoran Desert has already far outstripped the carrying capacity of the land. We are living on borrowed water, and borrowed time. Infinite future growth cannot be the premise on which our society is built. Such an assumption is the logic of cancer. It's time to stop enabling the destruction of natural communities and warming the climate by encouraging more vehicle trips with more roads by propping up limitless human impacts and expansion with ever more infrastructure.</p> <p>Please don't build this road. Just don't build it. There are enough roads.</p> <p>I am a homeowner and registered voter living in Tucson.</p> <p>Thank you,</p>	<p>Thank you for your comment. The Sonoran Corridor project has been proposed by local authorities to address the anticipated growth and travel needs in the study area. See Need and Purpose (Chapter 1 of the DEIS.) The decision about the type and extent of growth is the purview of each community's legislative process. This project uses those decisions as the basis for identifying the effects of such an effort and how to minimize the impacts of building it, if it is built. That decision will be the subject of further discussion once the Final Tier1 EIS/Record of Decision and an additional Tier 2 level study are completed.</p>
Hackenslash, Les	email	<p>Hi, Andy and Jacob:</p> <p>I hope this finds you well of body and spirit.</p> <p>Are there plans to have South Alvernon Way (south of the airport and Raytheon) connect with the proposed Sonoran Corridor? According to ADOT's presentation (~3.28MB, twenty-five pages, PDF format) -- https://azdot.gov/sites/default/files/media/2020/12/SC-Final-Presentation-English.pdf -- the preferred alternative would exit I-19 south of El Toro, head east to the Alvernon alignment, north to Old Vail Connection, then east to I-10 and Rita Road (see page 14).</p> <p>Currently, southbound Alvernon curves west on Aerospace Pkwy to meet South Nogales Hwy.</p> <p>Since, one assumes, the Sonoran Corridor would be a "complete street" (albeit a high-speed one) with proper bicycle lanes (or separate bikeways entirely), connecting the existing Alvernon way with this new road would add a bike connection between Tucson and Sahuarita, and perhaps create a "sub-Loop" between the Santa Cruz River, Valencia, Nogales Hwy, new Sonoran Corridor, Alvernon, and Aviation Bikeway. Also, the connection of the east end of Sonoran Corridor and Rita Road could be "bike-ified" to create a connection to the Julian Wash Bikeway and the southeast of Tucson.</p> <p>Since the only two opportunities to contribute ideas to a project are either when it's too soon to tell or it's too late to bother, I'm hoping to land in the "too soon" area and plant some seeds.</p> <p>For your consideration.</p> <p>Thank you,</p> <p>Les (member of BAC but not communicating in that capacity).</p>	<p>Thank you for your comment. No interchange details have been decided yet; however, it is very likely that Alvernon Way/Aerospace Parkway would be a logical place for an interchange. Traffic analysis completed for the Sonoran Corridor project assumed there would be a future interchange at that location.</p> <p>The final configuration of the Sonoran Corridor will be determined following a Tier 2 analysis, but it is envisioned as a high capacity/high priority facility. No decision has been made regarding alternative modes within the corridor, but the opportunity for a bicycle facility has been discussed and would be possible as the project becomes better defined. It is expected you will be able to comment on the topic as part of the NEPA Tier 2 process.</p>

Walden, Richard and Nan, o/b/o Farmer's Investment Company (FICO)	Letter	<div><div><div><div><div><div>FARMERS INVESTMENT CO.</div><div>P.O. BOX 7 SAHUARITA, ARIZONA 85629-0007 U.S.A.</div></div></div><div><div><div><div><div>FARMING AND FARM MANAGEMENT: SANTA CRUZ VALLEY FARM, AZ SAN SIMON FARM, AZ BLUE THREE GROVES, GEORGIA</div><div><div>EST. 1937</div></div><div>PROCESSING, MARKETING & WATER: THE GREEN VALLEY PECAN COMPANY THE PECAN STORE GREEN VALLEY PECANS FARMERS WATER CO.</div></div></div></div></div></div><div><p>TRANSMITTED VIA EMAIL AND U.S. POSTAL SERVICE</p><p>December 9, 2020</p><p>Sonoran Corridor Tier 1 EIS Study Team c/o Joanna Bradley 1221 S. Second Avenue, Mail Drop T100 Tucson, AZ 85713</p><p>Re: Comment from Farmers Investment Co - Sonoran Corridor Draft Tier 1 Environmental Impact Statement (EIS)</p><p>Dear Ms. Bradley,</p><p>Thank you for the opportunity to provide input into the Sonoran Corridor Draft Tier 1 EIS process. Over 70 years ago our family started Farmers Investment Co (FICO), parent company of Green Valley Pecan based in Sahuarita, Arizona. FICO owns and farms pecans on over 6,500 acres along the Santa Cruz River in the Green Valley / Sahuarita communities.</p><p>We have seen many changes as growth and urbanization have occurred in eastern Pima County and recognize the importance of long-range planning, such as the present effort associated with the Sonoran Corridor. Indeed, several years ago FICO undertook a comprehensive master planning effort of its properties resulting in the Sahuarita Farms and Continental Farms Master Plans. Consequently, we value and applaud ADOT's inclusive and transparent process of long-range planning for the establishment of this major transportation corridor in the southern portion of the Tucson metropolitan area.</p><p>After reviewing the draft Tier 1 EIS, FICO is supportive of the proposed preferred alternative - Alternative 7. The analysis completed in the Draft Tier 1 EIS makes a compelling case for the preferred alternative as it meets the project purpose and need while balancing congestion reduction, growth, accessibility and environmental concerns.</p><p>That said, FICO may be directly impacted by the preferred alternative as the study corridor appears to cross its property. If the Sonoran Corridor project advances to a Tier 2 study based on the preferred alternative, FICO looks forward to a process of active engagement with ADOT and its Sonoran Corridor project team to understand any impacts on its properties and how they will be mitigated.</p><p>Thank you again for the opportunity to comment on the Sonoran Corridor project. Please don't hesitate to contact Tim Campbell at FICO (tcampbell@greenvalleypecan.com) should you have any questions or require additional information from us.</p><div><div>Tel: (520) 879-7400</div><div>Fax: (520) 791-2853</div></div></div></div></div>	Thank you for your comments. As an affected property owner FICO will definitely be included in any further Tier 2 studies.
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NAME	CHANNEL	COMMENT	RESPONSE
		<div><div>Respectfully, Farmers Investment Co</div><div></div><div>Richard S. Walden Chief Executive Officer and Chair</div><div></div><div>Nan S. Walden Vice President and Counsel</div><div>Cc: Tim Campbell – Director of Land Resources, Farmers Investment Co</div></div> <div><div>Tel: (520) 879-7400</div><div>Fax: (520) 791-2853</div></div>	

NAME	CHANNEL	COMMENT	RESPONSE
Osborn, Jason	In-person spoken comment	<p>And I am a resident that would be impacted, I guess. I live in Sycamore Park, which is one of the probably closest neighborhoods over on the northeast side of where it would connect to 10. I guess my input is that I believe that the alternative 7 is a better proposal than the alternative 8; and the alternative 7 being the one that runs further south.</p> <p>A couple reasons is that right now the alternative 7, which is currently the primary one, exits at Rita Ranch. I use that every day when I drop my kids off, pick them up. There's thousands of other families that use that every day going back and forth to work as well. And it's already a very busy exit. The concern is that it would get busier with this.</p> <p>And the second reason, I believe the further south one is a better alternative is that -- the noise, I guess. So where I'm at in Sycamore Park, we're just south of Highway 10. We have the highway noise. And this would therefore, increasing the amount of noise that is in the neighborhood that we have that we deal with. So that's all I have.</p>	<p>The Sonoran Corridor Study Alternative 8A runs about a mile and a half south of Alternative 7, the Selected Alternative.</p> <p>The Rita Road exit/entrance for Alternative 7 would feature both a system interchange between I-10 and the Sonoran Corridor, and a service interchange at Rita Road to serve local traffic.</p> <p>Depending on the final alignment, the east-west segment of a roadway within the Selected Alternative 7 would pass the Sycamore Park neighborhood between 3,000 feet and 5,000 feet south of the current terminus of Kolb Road. This study identifies a wide corridor of 2,000 feet, within which a more detailed alignment of about 400 feet will be identified. The details of the final alignment will be developed in a Tier 2 analysis that will follow this study.</p> <p>A key difference between Corridor Alternatives 7 and 8A is in how effectively they serve the anticipated growth in the area. Corridor Alternative 7, along Old Vail Connection Road, is closer to existing and future employment (which is a critical objective of the study) and has fewer environmental impacts than Corridor Alternative 8A. Public comments on the topic will be solicited as part of the Tier 2 NEPA process.</p>
Sumner, Michael	Spoken comment via telephone	<p>I am very supportive of the Sonoran 7 Corridor. We must think far outside the box. As you know, we have continued to grow as a metropolitan area for years with adequate -- or I should say inadequate transportation facilities, especially with high capacity roadways such as freeways and parkways.</p> <p>As much as people who don't like those words or the fact that we are a growing metropolitan area, these facilities are essentially, I should say -- I'm a little nervous here -- it is extremely crucial to the development of the transportation fabric. It also helps bring industry here that would choose to locate in a city that has better transportation modes.</p> <p>So, therefore, it would also help bring higher paying jobs and look at Tucson very differently than they do now. It would give the city a chance and the county and the metropolitan area a chance to -- to be recognized that we do have the facilities that we do need.</p> <p>And we do know that that area of the south and west where this corridor is supposed to be is going to be an extremely high growth area. And I-10, I-19 will just not be able to handle the additional traffic that will be generated by more businesses, more homes, and more traffic, and going through what is there now.</p> <p>So I am totally supportive of this project. I have been following this project for years when it was dubbed the Sahuarita Corridor, and -- and then it's morphed into this.</p> <p>So I'm also supportive of I-11 going through Avra Valley, which I know is highly controversial. But, like I said, we are in the Sun Corridor.</p> <p>Anyway, I just want to say thank you. And we do need to have freeways and parkways and grade-separated interchanges in our valley, as well as local transportation. Thank you.</p>	<p>Thank you for your comments.</p>
Basye, Richard	Spoken comment via telephone	<p>One thing I noticed in your development through the evaluation of three different plans, which no estimate it appeared was on the cost to the taxpayer. The plan you have is about nine miles long, as I saw it, versus three to four miles, if the Vail Road connection was done.</p> <p>Also, the Vail Road connection has an interchange now on the extension of the Old Vail Road to I-19 to an underpass with a dirt road at the present time, again, saving taxpayers money. It also would not require three 90-degree turns to get from I-19 to I-10. Just one 90-degree turn. Those things should be beneficial to all.</p> <p>Also, I have a concern, since a larger developer in that area wants to build a square mile home development, it is being done in that format that you have planned to serve his interest rather than ours. Thank you.</p>	<p>Thank you for your comment. In developing and screening alternatives for the Draft Tier 1 EIS, it was found that the extension of the Old Vail Connection Road to the west has major challenges that make it impossible to function as part of the Sonoran Corridor. The segment between Nogales Highway and the Papago interchange on I-19 is a very sensitive Native American cultural area influenced. In addition, Corridor Alternative 1 on the San Xavier District of the Tohono O'odham Nation is subject to a different set of requirements because the Nation is a sovereign government. Much of the decision about what can and cannot be done on Tribal lands is the purview of the allotted property owners. To date, there has not been the necessary support for the Sonoran Corridor from the allottee private landowners to move forward on their lands.</p> <p>Costs will be examined in more detail in the Tier 2 study. Input from many stakeholders as well as the public were factored into the design of the initial corridors, but engineering and environmental considerations ultimately played the determining factors both in determining the three corridor alternatives studied in the Draft Tier 1 EIS, and the identification of Corridor Alternative 7 as the Selected Alternative.</p>

NAME	CHANNEL	COMMENT	RESPONSE
			The Verano residential development, once anticipated for the area, has effectively been eliminated. Much of the property associated with that former plan is allocated to a future solar farm.
Martinez, Lisa	Spoken comment via telephone	<p>This seems like an exercise in futility. We've been making comments on this issue for I don't know how many years now, and, obviously, our comments, especially from residents of this beautiful valley, are not being heard or listened to or heeded or considered at all, because, it appears like there's already a plan in place to go through Avra Valley.</p> <p>This is an area that is unique, and going through this valley will ruin it. You've got I-10 that can be piggybacked at a lot less cost and a lot less environmental impact.</p> <p>And as a previous commenter stated, it seems like it's maybe serving one person who wants to do some development along the route.</p> <p>And, quite frankly, I've been living in this valley for over 30 years. And the reason that I and most people are out here was to be away from things like that.</p> <p>So I'm kind of getting tired of these sessions where we keep commenting and commenting and commenting and being ignored. That's all I have right now.</p>	Thank you for your comment. It appears to refer to the I-11 project that is also underway. Your comment will be forwarded to that project team.
Sumner, Michael	Spoken comment via telephone	<p>I have been involved in transportation issues in this valley for a long time. I have sat on various committees concerning transportation. And I have watched Tucson grow exponentially. And we can't put our heads in the sand and pretend that this valley is not going to grow.</p> <p>And though I sympathize with those people that live in Avra Valley, but they live in a metropolitan area. And that's what happens when you live in a growing city, and we have to plan reasonably. We are in the Sun Corridor, which connects now Pima and Maricopa Counties.</p> <p>And as much as I would love to spare Avra Valley, the fact is, is that something can be -- something has to be done. I-10 cannot handle the upcoming traffic and development that will be coming to this valley. And you can't put updates and say you can't move here. That is just unAmerican.</p> <p>And the only thing that will stop growth in the southern and northern portion or central portion of the Sun Corridor is water. And we're not to that point yet.</p> <p>So I do support the Sonoran Corridor. I support the extension of I-10 with 210. I do support the Sonoran Corridor, again. And that is very, very, very crucially important, at least for that part of the loop to connect 10 and 19 on the eastern/western quadrant known as the Sonoran Corridor.</p> <p>And I want to thank each and every one of you for your time and your effort in working on this.</p> <p>And for the comment that was made that this is not a developer. I am a citizen of the city of Tucson and a member of Pima County. And Tucson needs to wake up and stop thinking that it's a little cow town, because it's not. We are growing. And eventually we will merge with Phoenix and we will be one big megalopolis, whether we like it or not. Thank you so much.</p>	Thank you for your comments.
Martinez, Lisa	Spoken comment via telephone	<p>So -- you know, and as the last person stated, so that truckers can save 20 minutes, we should all lose the way of life that we have enjoyed?</p> <p>We don't expect growth. We all have large properties with lots of acreage. So -- and we had purchased that back when so that we could avoid the kind of growth that Tucson is experiencing.</p> <p>Again, we do not consider ourself part of the Tucson metro area. We are separated from the Tucson metro area by the Tucson Mountain Range.</p> <p>So that is all I have to add right at the moment.</p>	Thank you for your comment. It appears to refer to the I-11 project that is also underway. Your comment will be forwarded to that project team.
Schlitz, Mary Terry	Spoken comment via telephone	It's a source of frustration and cause for dismay that it is extremely difficult to find the Environmental Impact Statement on the ADOT website. Could you please correct this? I don't think it's available there at all. I've looked, and I sure don't see it. If it is there at all, it's extremely difficult to find, and that's a source of concern. Please remedy that so that those of us who really like	The Tier 1 Draft EIS is on the ADOT website at azdot.gov/sonorancorridor under the tab "Draft Environmental Impact Statement."

NAME	CHANNEL	COMMENT	RESPONSE
		to study the issues and delve deeply into them can be aware of what is going on. There's not very good media coverage of this, and we really need a lot more attention paid to such an enormous undertaking, such a huge project as is being discussed. Thank you very much.	
Sumner, Michael	Spoken comment via telephone	<p>Going strictly back to the Sonoran Corridor. I support it. It's important. There's about 60,000 people in Green Valley and Sahuarita combined, not to mention additional population that will be moving directly into the area. And that is an extremely high growth area. And that is also where Tucson has annexed significantly into that area, and that is where Tucson is going to grow. Just the city of Tucson alone, not to mention Green Valley and Sahuarita and unincorporated Pima County. The roads out there are insufficient.</p> <p>And, also, if we don't do something with that area, it will get developed and it will make it even more harder and costly to develop a facility such as the Sonoran Corridor, which is the word freeway, to connect the two. So I do support the plan, and I do support the -- the seven alignments and -- I want to thank everyone. My last comment for the night. But I am a part of Pima County, and I vote, and I help support those people in Avra Valley. And they're just scared to death that if the Sonoran Corridor happens, that I-11 possibly could happen.</p> <p>Anyway, thank you, thank you, thank you. Take care. Bye-bye.</p>	Thank you for your comments.
Holler, Eric	Spoken comment via telephone	I just want to clarify. Pima County has a project going that they're calling the Auxiliary Interstate Highway I-10 to I-19 Project. It includes development, roads, and a new proposed water district. Are you aware of Pima County? And I assume that you're talking to and coordinating with Pima County on their project, which is very similar. Well, that's my statement. I ask that you coordinate with Pima County on their Auxiliary Interstate Highway I-10 to I-19 Project.	The Pima County project was a precursor to this effort and was used as input into this analysis. Pima County participated in the Sonoran Corridor study from the beginning of the project.
Dehaven, Denise	In-person spoken comment	<p>Thank you for having these public options here for us to come and see what you guys are proposing, number one.</p> <p>And looking at the graphs that were presented, the preferred one, which I think is number 7, seems to be less destructive as far as going through communities. But one thing that I do encourage, if there is any way to not go through a neighborhood and displace homes, people from their homes, we have got to keep that in mind if it's moving the road just a little bit one way or another to not have to disrupt people in their homes. That has to be one of the top priorities, in my opinion, especially nowadays with people struggling and losing jobs and all of that.</p> <p>I know this is going to be down the road when this actually happens. And so maybe the economy will be at a better spot when this happens, but I think we kind of need to look at where we are today. And where we are today, people cannot afford to be displaced from their homes.</p> <p>8A, from what I can tell, which thank goodness that doesn't look like it's the one that is going to be top, or the preferred, right now, but 8A goes straight through my neighborhood and that would displace about 120 -- I think there's 120 people out there.</p> <p>So, obviously, that is dear -- very dear to me because I don't want my neighborhood to be taken out. And with the eminent domain. So that would not be a good thing. It's a very quiet neighborhood. Everybody keeps to themselves. And everybody is on four acres of land. And we just love that neighborhood. There's a lot of horses and everything out there. And it's a great neighborhood.</p> <p>So I don't want 8A if that goes straight through my neighborhood, which is the Swan Road Ranches.</p> <p>At the end of Swan, which is not shown on any of your maps at this time, is a massive solar farm that has now gone up. It starts at Wilmot, and it goes past Swan.</p> <p>So I'm thinking that might be taken into consideration as far as -- I know that will be taken into consideration where things are. And maybe when you guys relook at stuff after they're done building that huge solar farm, that might change stuff as well. But the -- the proposed one seems to be far enough west to avoid that solar farm. And it's far enough south to avoid that solar farm, and then it connects at Old Vail. My concern is going through the prisons, that you guys aren't going to have enough space to go through the prisons, and it might not work. That's why I do not want 8A going straight through my neighborhood.</p> <p>I am out of time. I have taken up three minutes. I can go longer if I wanted, but I will stop right now. Thank you.</p>	Thank you for your comment. The Tier 1 EIS covers a 2,000-foot-wide corridor, within which a future more detailed roadway alignment would be located (see Section 1.2 describing the project status and intent). The intent of the wide swath is to allow for accommodations of the type mentioned in the comment when designing a much narrower facility of no more than about 400 feet. No homes have been identified to be directly affected by the project so far, and every effort will be made to avoid residences in future studies and engineering design efforts. Corridor Alternative 7 is the Selected alternative, so the project will not likely affect the community near Swan Road. The study has coordinated with both the solar farm activity in the area and the prisons. The corridor can be built to avoid impact on both the solar farms and the prisons.

NAME	CHANNEL	COMMENT	RESPONSE
Bartholomaei, Kelzi	email	I think that I prefer the proposals from most preferred to least preferred: Corridor 7 Corridor 8A Corridor 1 Thank you.	Thank you for your comment.
Kershner, Camille	email	no new freeway miles, (much cheaper to maintain, especially in a low-carbon economy) rail instead- start with phx/tucson, there already a tier 1 eis and compare costs (and safety) per mile...	Thank you for your comment. The purpose and need for a Sonoran Corridor identified in this Tier 1 EIS is not addressed by the Arizona Passenger Rail Corridor Study Tier 1 EIS.
Gelpieyrn, Aubrey	Spoken comment via telephone	I'm just wondering what the next step specifically in this project will be.	<p>Thank you for your participation. Comments received on the Draft Tier 1 EIS during the public review and comment period were considered to determine the Selected Alternative, and the combined Final Tier 1 EIS/Record of Decision (ROD) was prepared, documenting the responses to all comments. Issuance of the combined Final Tier 1 EIS/ROD with a Selected Alternative concludes the Tier 1 environmental study.</p> <p>The Selected Alternative will be further evaluated and refined for future Tier 2 analyses. A preliminary design will need to be completed to develop the level of detail necessary to enable more site-specific environmental analyses and advancement of site-specific mitigation measures. As funding becomes available, the initial roadway concept might be for one or more logical segments of the Selected Alternative corridor (as opposed to its entire length), and the NEPA Class of Action (whether an EIS, an Environmental Assessment, or a Categorical Exclusion is warranted for environmental analysis) would be determined by ADOT based on the nature of the project pursuant to either the 326 or the 327 Memorandum of Understanding conferring NEPA assignment to ADOT. Continuing coordination with the Tribes, public, and agencies would occur prior to and during Tier 2 project-level NEPA analysis.</p>